

EXHIBIT 8

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

DHI Group, Inc. f/k/a Dice Holdings Inc. and
RIGZONE.com, Inc.,

Plaintiffs,

vs.

David W. Kent, Jr., Single Integrated Operations Portal, Inc. d/b/a Oilpro and OILPRO.com, Estevan Dufrin, Matthew Kent, Bryan Robins, Jeremy Antonini, and John Does Nos. 1-10,

Defendants.

Civil Action Number: 16-cv-01670

Single Integrated Operations Portal, Inc. d/b/a Oilpro and OILPRO.com,

Counter-Plaintiff,

vs.

DHI Group, Inc. f/k/a Dice Holdings Inc. and
RIGZONE.com, Inc.,

Counter-Defendants.

Oilpro's Response to Plaintiffs' First Requests for Production

To: **Plaintiffs DHI Group, Inc. f/k/a Dice Holdings, Inc. and Rigzone.com, Inc.**, by and through their attorneys of record, Kevin T. Jacobs, Justin G. Lipe, Christine Ng, Baker Botts, L.L.P., One Shell Plaza, 910 Louisiana Street, Houston, Texas 77002-4995 and Richard B. Harper, Douglas W. Henkin, Baker Botts, L.L.P., 30 Rockefeller Plaza, New York, NY 10112.

Defendant and Counter-Plaintiff Single Integrated Operations Portal, Inc. d/b/a Oilpro and OILPRO.com submits his objections to DHI Group, Inc. f/k/a Dice Holdings Inc. and RIGZONE.com, Inc.'s ("Plaintiffs") first request for production, under Rules 26 and 34 of the Federal Rules of Civil Procedure, as follows.

GENERAL STATEMENT REGARDING PRODUCTION

1. Any documents produced by Oilpro will be subject to a mutually agreed upon Protective Order, which the parties are in the process of negotiating, once one has been entered in the case.
2. Oilpro objects to the date and location for production of documents found in Plaintiffs' Requests for Production, and will produce any responsive non-privileged documents at a time and place mutually convenient to the parties.

OBJECTIONS TO INSTRUCTIONS AND DEFINITIONS

1. Oilpro objects to Instruction 4 as worded because it constitutes an interrogatory by calling for a response to written questions. As such, it is inappropriate as a Request for Production and potentially exceeds the bounds of discovery permitted by Fed. R. Civ. P. 33 and Local Rule 33.1.
2. Oilpro objects to Instruction 6 because as to person or entity mentioned, it includes within its scope "all past or present employees, officers, directors, partners, agents, representatives, attorneys of that person, organization, or entity and its predecessors and successors," regardless of whether they purport to act on behalf of the subject person or entity. Such instruction renders various requests overly broad, confusing, harassing, and meaningless. Oilpro will respond in accordance with the normal meaning of an individual or entity's name.
3. Oilpro objects to Instruction 14 as worded because it constitutes an interrogatory by calling for a response to written questions. As such, it is inappropriate as a Request for Production and potentially exceeds the bounds of discovery permitted by Fed. R. Civ. P. 33 and Local Rule 33.1.
4. Oilpro objects to Definition 16 as worded regarding "Rigzone Information" as overly broad, unduly burdensome, ambiguous, confusing, vague, and not likely to lead to the discovery of admissible evidence. The definition is far broader than anything relevant or material to the allegations in the suit; the definition calls for speculation on the part of Oilpro; the term "information" is unclear; the definition calls for a legal conclusion; and the definition necessarily is not limited in time and scope by referring to "at any point." Oilpro also objects to any other definitions that rely on the definition of this term.

RESPONSES AND OBJECTIONS TO REQUESTS FOR PRODUCTION

Request for Production No. 1: Please produce all communications and documents exchanged between you and any of the Defendants referring or relating to the Lawsuit.

Response: Oilpro objects to this request for production because it may include within its scope trial-preparation material (documents that are prepared in anticipation of litigation or for trial) exempted from discovery by Fed. R. Civ. P. 26(b)(3). Oilpro further objects to this request for production because it may include within its scope documents and communications that are exempted from discovery by the attorney-client privilege, joint-defense privilege, and/or the attorney work-product doctrine. Oilpro further objects to this request for production because it does not seek documents relevant to any claim or defense in this lawsuit; specifically, Oilpro objects to this request for production because it necessarily includes within its scope the time period of March 29, 2016 through the present, when the parties had the reasonable expectation that litigation may ensue. Oilpro further objects to this request for production because it fails to identify the requested materials with reasonable particularity as required by FED. R. Civ. P. 34(b).

Request for Production No. 2: Please produce all communications and documents exchanged between you and any of the Defendants referring or relating to the Federal Complaint.

Response: Oilpro objects to this request for production because it may include within its scope trial-preparation material (documents that are prepared in anticipation of litigation or for trial) exempted from discovery by Fed. R. Civ. P. 26(b)(3). Oilpro further objects to this request for production because it may include within its scope documents and communications that are exempted from discovery by the attorney-client privilege, joint-defense privilege, and/or the attorney work-product doctrine. Oilpro further objects to this request for production because it does not seek documents relevant to any claim or defense in this lawsuit; specifically, Oilpro objects to this request for production because it necessarily includes within its scope the time period of March 29, 2016 through the present, when the parties had the reasonable expectation that litigation may ensue. Oilpro further objects to this request for production because it fails to identify the requested materials with reasonable particularity as required by FED. R. Civ. P. 34(b).

Request for Production No. 3: Please produce all communications and documents exchanged between you and any of the Defendants referring or relating to the Federal Information.

Response: Oilpro objects to this request for production because it may include within its scope trial-preparation material (documents that are prepared in anticipation of litigation or for trial) exempted from discovery by Fed. R. Civ. P. 26(b)(3). Oilpro further objects to this request for production because it may include within its scope documents and communications that are exempted from discovery by the attorney-client privilege, joint-defense privilege, and/or the attorney work-product doctrine. Oilpro further objects to this request for production because it does not seek documents relevant to any claim or defense in this lawsuit; specifically, Oilpro objects to this request for production because it necessarily includes within its scope the time period of March 29, 2016 through the present, when the parties had the reasonable expectation that litigation may ensue. Oilpro further objects to this request for production because it fails to identify the requested materials with reasonable particularity as required by FED. R. Civ. P. 34(b).

Request for Production No. 4: Please produce any joint defense agreement(s) between you and any of the Defendants.

Response: Oilpro is currently reviewing and collecting documents within its possession and control and Oilpro will produce any responsive documents it discovers.

Request for Production No. 5: Please produce all communications and documents exchanged between you and any member of the Federal Bureau of Investigation or the U.S. Attorney's Office, including without limitation Evalina Aslanyan, Jay Kramer, Sam Adelsberg, Sid Kamaraju, and Andrew Chan, concerning any of the Defendants, Rigzone, the Federal Complaint, the Federal Information, the Lawsuit, or any alleged wire fraud or illegal action performed by one or more of the Defendants.

Response: Oilpro objects to this request for production because it does not seek documents relevant to any claim or defense in this lawsuit. Oilpro objects to this request for production because it may include within its scope documents that are outside its possession and control. Oilpro further objects to this request for production because it may include within its scope documents that are outside its possession and control.

Request for Production No. 6: Please produce the recording of David Kent's interview on the date of his arrest by the Federal Bureau of Investigation.

Response: Oilpro objects to this request for production because it does not seek documents relevant to any claim or defense in this lawsuit. Oilpro objects to this request for production because it may include within its scope documents that are outside its possession and control. Oilpro further objects to this request for production because it may include within its scope documents that are outside its possession and control.

Request for Production No. 7: Please produce any transcripts of the recording of David Kent's interview on the date of his arrest by the Federal Bureau of Investigation.

Response: Oilpro objects to this request for production because it does not seek documents relevant to any claim or defense in this lawsuit. Oilpro objects to this request for production because it may include within its scope documents that are outside its possession and control. Oilpro further objects to this request for production because it may include within its scope documents that are outside its possession and control.

Request for Production No. 8: Please produce documents identified as 000001–021324 produced from the U.S. Attorney's Office.

Response: Oilpro objects to this request for production because it does not seek documents relevant to any claim or defense in this lawsuit. Oilpro objects to this request for production because it may include within its scope documents that are outside its possession and control. Oilpro further objects to this request for production because it may include within its scope documents that are outside its possession and control.

Request for Production No. 9: Please produce all Western Digital Passports and any other portable electronic hard drives and storage devices produced from the U.S. Attorney's Office.

Response: Oilpro objects to this request for production because it does not seek documents relevant to any claim or defense in this lawsuit. Oilpro objects to this request for production because it may include within its scope documents that are outside its possession and control. Oilpro further objects to this request for production because it may include within its scope documents that are outside its possession and control.

Request for Production No. 10: Please produce any record phone calls, conversations, or meetings between David Kent and either Plaintiff.

Response: Oilpro objects to this request for production because it is unclear what is requested; Oilpro's response assumes that Plaintiffs intended to request that Oilpro "produce any record *of* phone calls . . ." Oilpro further objects to this request for production because it does not seek documents relevant to any claim or defense in this lawsuit. Oilpro objects to this request for production because it may include within its scope documents that are outside its possession and control.

Subject to the foregoing objections and limitations, Oilpro will produce responsive documents for the date range October 1, 2013, to March 29, 2016. Oilpro is currently reviewing and collecting documents within its possession and control and will supplement this response to advise Plaintiffs if it is knowingly withholding any materials identified in this search on the basis of the objections identified above.

Request for Production No. 11: Please produce all recordings of phone conversations between David Kent and either Plaintiff.

Response: Oilpro objects to this request for production because it does not seek documents relevant to any claim or defense in this lawsuit; specifically, Oilpro objects because the request for production is not limited to a relevant time period. Oilpro objects to this request for production because it may include within its scope documents that are outside its possession and control. Oilpro objects to this request for production as the requested discovery is not proportional to the needs of the case because Plaintiffs have equal access to the relevant information.

Request for Production No. 12: Please produce all transcripts of recorded phone conversations between David Kent and either Plaintiff.

Response: Oilpro objects to this request for production because it does not seek documents relevant to any claim or defense in this lawsuit; specifically, Oilpro objects because the request for production is not limited to a relevant time period. Oilpro objects to this request for production because it may include within its scope documents that are outside its possession and control. Oilpro objects to this request for production as the requested discovery is not proportional to the needs of the case because Plaintiffs have equal access to the relevant information.

Request for Production No. 13: Please produce all video recordings of any meeting between David Kent and either Plaintiff.

Response: Oilpro objects to this request for production because it does not seek documents relevant to any claim or defense in this lawsuit; specifically, Oilpro objects because the request for production is not limited to a relevant time period. Oilpro objects to this request for production because it may include within its scope documents that are outside its possession and control. Oilpro objects to this request for production as the requested discovery is not proportional to the needs of the case because Plaintiffs have equal access to the relevant information.

Request for Production No. 14: Please produce all transcripts of any video-recorded meeting between David Kent and either Plaintiff.

Response: Oilpro objects to this request for production because it does not seek documents relevant to any claim or defense in this lawsuit; specifically, Oilpro objects because the request for production is not limited to a relevant time period. Oilpro objects to this request for production because it may include within its scope documents that are outside its possession and control. Oilpro objects to this request for production as the requested discovery is not proportional to the needs of the case because Plaintiffs have equal access to the relevant information.

Request for Production No. 15: Please produce a list of the e-mail addresses and resident IDs that were allegedly accessed without authorization from Rigzone's website.

Response: Oilpro objects to this request for production because it does not seek documents relevant to any claim or defense in this lawsuit. Oilpro objects to this request for production because it calls for a legal conclusion relating to whether any access was "without authorization." Oilpro objects to this request for production because it may include within its scope documents that are outside its possession and control.

Request for Production No. 16: Please produce all communications and documents that were provided to, obtained from, or received from any member of the Federal Bureau of Investigation or the U.S. Attorney's Office, including without limitation Evalina Aslanyan, Jay Kramer, Sam Adelsberg, Sid Kamaraju, and Andrew Chan, from January 1, 2015 to present.

Response: Oilpro objects to this request for production because it does not seek documents relevant to any claim or defense in this lawsuit. Oilpro further objects to this request for production because it fails to identify the requested materials with reasonable particularity as required by FED. R. CIV. P. 34(b).

Request for Production No. 17: Please produce all Electronic Devices, including any complete or partial copies of Electronic Devices, that were provided to, obtained from, or received from any member of the Federal Bureau of Investigation or the U.S. Attorney's Office, including without limitation Evalina Aslanyan, Jay Kramer, Sam Adelsberg, Sid Kamaraju, and Andrew Chan, from January 1, 2015 to present.

Response: Oilpro objects to this request for production because it does not seek documents relevant to any claim or defense in this lawsuit. Oilpro further objects to this request for production because it fails to identify the requested materials with reasonable particularity as required by FED. R. CIV. P. 34(b). Oilpro further objects to this request for production because it may include within its scope documents that are outside its possession and control.

Request for Production No. 18: Please produce all Electronic Devices, including any complete or partial copies of Electronic Devices, that were collected by the Federal Bureau of Investigation from Oilpro's office(s) or offsite server location(s) from March 2016 to present.

Response: Oilpro objects to this request for production because it does not seek documents relevant to any claim or defense in this lawsuit. Oilpro further objects to this request for production because it fails to identify the requested materials with reasonable particularity as required by FED. R. CIV. P. 34(b). Oilpro further objects to this request for production because it may include within its scope documents that are outside its possession and control.

Request for Production No. 19: Please produce all communications and documents referring or relating to "Operation Resume Hoard," including without limitation the email communication described in Paragraph 53 of Plaintiffs' Original Complaint.

Response: Oilpro objects to this request for production because it may include within its scope trial-preparation material (documents that are prepared in anticipation of litigation or for trial) exempted from discovery by Fed. R. Civ. P. 26(b)(3). Oilpro objects to this request for production because it may include within its scope documents and communications that are exempted from discovery by the attorney-client privilege, joint-defense privilege, and/or the attorney work-product doctrine. Oilpro objects to this request for production because it does not seek documents relevant to any claim or defense in this lawsuit; specifically, Oilpro objects because the request for production is not limited to a relevant time period.

Subject to the foregoing objections and limitations, Oilpro will produce responsive documents for the date range October 1, 2013 – March 29, 2016. Oilpro is

currently reviewing and collecting documents within its possession and control and will supplement this response to advise Plaintiffs if it is knowingly withholding any materials identified in this search on the basis of the objections identified above.

Request for Production No. 20: Please produce all communications and documents referring or relating to Estevan Dufrin or any other Defendant accessing information from any Google Analytics account owned by Plaintiffs, including without limitation the email communications described in Paragraphs 76 and 78 of Plaintiffs' Original Complaint.

Response: Oilpro objects to this request for production because it may include within its scope trial-preparation material (documents that are prepared in anticipation of litigation or for trial) exempted from discovery by Fed. R. Civ. P. 26(b)(3). Oilpro objects to this request for production because it may include within its scope documents and communications that are exempted from discovery by the attorney-client privilege, joint-defense privilege, and/or the attorney work-product doctrine. Oilpro objects to this request for production because it does not seek documents relevant to any claim or defense in this lawsuit; specifically, Oilpro objects because the request for production is not limited to a relevant time period.

Subject to the foregoing objections and limitations, Oilpro will produce responsive documents for the date range October 1, 2013 – March 29, 2016. Oilpro is currently reviewing and collecting documents within its possession and control and will supplement this response to advise Plaintiffs if it is knowingly withholding any materials identified in this search on the basis of the objections identified above.

Request for Production No. 21: Please produce all communications and documents referring or relating to any actual, potential, or proposed scraping, extracting, crawling, or posting of jobs from Rigzone's website, including without limitation the email communications described in Paragraphs 80 and 83 of Plaintiffs' Original Complaint.

Response: Oilpro objects to this request for production because it may include within its scope trial-preparation material (documents that are prepared in anticipation of litigation or for trial) exempted from discovery by Fed. R. Civ. P. 26(b)(3). Oilpro objects to this request for production because it may include within its scope documents and communications that are exempted from discovery by the attorney-client privilege, joint-defense privilege, and/or the attorney work-product doctrine. Oilpro objects to this request for production because it does not seek documents relevant to any claim or defense in this lawsuit; specifi-

cally, Oilpro objects because the request for production is not limited to a relevant time period.

Subject to the foregoing objections and limitations, Oilpro will produce responsive documents for the date range October 1, 2013 – March 29, 2016. Oilpro is currently reviewing and collecting documents within its possession and control and will supplement this response to advise Plaintiffs if it is knowingly withholding any materials identified in this search on the basis of the objections identified above.

Request for Production No. 22: Please produce all documents and communications (including any attachments thereto) that refer to, relate to, or include the January 22, 2014 email from David Kent (david@oilpro.com) to Estevan Dufrin (estevan@oilpro.com), in which David Kent writes, “I really, really don’t want anyone to know about third party resumes.”

Response: Oilpro objects to this request for production because it may include within its scope trial-preparation material (documents that are prepared in anticipation of litigation or for trial) exempted from discovery by Fed. R. Civ. P. 26(b)(3). Oilpro objects to this request for production because it may include within its scope documents and communications that are exempted from discovery by the attorney-client privilege, joint-defense privilege, and/or the attorney work-product doctrine. Oilpro objects to this request for production because it does not seek documents relevant to any claim or defense in this lawsuit; specifically, Oilpro objects because the request for production is not limited to a relevant time period.

Subject to the foregoing objections and limitations, Oilpro will produce responsive documents for the date range October 1, 2013 – March 29, 2016. Oilpro is currently reviewing and collecting documents within its possession and control and will supplement this response to advise Plaintiffs if it is knowingly withholding any materials identified in this search on the basis of the objections identified above.

Request for Production No. 23: Please produce all documents and communications (including any attachments thereto) that refer to, relate to, or include the Google Chat conversation dated April 2, 2014 between David Kent (david@oilpro.com) and Estevan Dufrin (estevan@oilpro.com), in which David Kent asks, “is Holly sending more today?”

Response: Oilpro objects to this request for production because it may include within its scope trial-preparation material (documents that are prepared in anticipation of litigation or for trial) exempted from discovery by Fed. R. Civ. P.

26(b)(3). Oilpro objects to this request for production because it may include within its scope documents and communications that are exempted from discovery by the attorney-client privilege, joint-defense privilege, and/or the attorney work-product doctrine. Oilpro objects to this request for production because it does not seek documents relevant to any claim or defense in this lawsuit; specifically, Oilpro objects because the request for production is not limited to a relevant time period.

Subject to the foregoing objections and limitations, Oilpro will produce responsive documents for the date range October 1, 2013 – March 29, 2016. Oilpro is currently reviewing and collecting documents within its possession and control and will supplement this response to advise Plaintiffs if it is knowingly withholding any materials identified in this search on the basis of the objections identified above.

Request for Production No. 24: Please produce all documents and communications (including any attachments thereto) that refer to, relate to, or include the Google Chat conversation dated April 2, 2014 between David Kent (david@oilpro.com) and Estevan Dufrin (estevan@oilpro.com), in which David Kent says, “Come on over and I can show what I have been doing.”

Response: Oilpro objects to this request for production because it may include within its scope trial-preparation material (documents that are prepared in anticipation of litigation or for trial) exempted from discovery by Fed. R. Civ. P. 26(b)(3). Oilpro objects to this request for production because it may include within its scope documents and communications that are exempted from discovery by the attorney-client privilege, joint-defense privilege, and/or the attorney work-product doctrine. Oilpro objects to this request for production because it does not seek documents relevant to any claim or defense in this lawsuit; specifically, Oilpro objects because the request for production is not limited to a relevant time period.

Subject to the foregoing objections and limitations, Oilpro will produce responsive documents for the date range October 1, 2013 – March 29, 2016. Oilpro is currently reviewing and collecting documents within its possession and control and will supplement this response to advise Plaintiffs if it is knowingly withholding any materials identified in this search on the basis of the objections identified above.

Request for Production No. 25: Please produce all documents and communications (including any attachments thereto) that refer to, relate to, or include the May 12, 2014 email from Estevan Dufrin (estevan@oilpro.com) to David Kent (david@oilpro.com)

stating “I have had several emails into support wanting us to delete their account, take them off our lists, etc.”

Response: Oilpro objects to this request for production because it may include within its scope trial-preparation material (documents that are prepared in anticipation of litigation or for trial) exempted from discovery by Fed. R. Civ. P. 26(b)(3). Oilpro objects to this request for production because it may include within its scope documents and communications that are exempted from discovery by the attorney-client privilege, joint-defense privilege, and/or the attorney work-product doctrine. Oilpro objects to this request for production because it does not seek documents relevant to any claim or defense in this lawsuit; specifically, Oilpro objects because the request for production is not limited to a relevant time period.

Subject to the foregoing objections and limitations, Oilpro will produce responsive documents for the date range October 1, 2013 – March 29, 2016. Oilpro is currently reviewing and collecting documents within its possession and control and will supplement this response to advise Plaintiffs if it is knowingly withholding any materials identified in this search on the basis of the objections identified above.

Request for Production No. 26: Please produce all documents and communications (including any attachments thereto) that refer to, relate to, or include the Google Chat conversation dated June 2, 2014 among Estevan Dufrin (estevan@oilpro.com) and Laura Bumby (laura@oilpro.com), in which Laura Bumby writes, “I think DK has hidden the history and the external resume from the candidate approver now that she is in.”

Response: Oilpro objects to this request for production because it may include within its scope trial-preparation material (documents that are prepared in anticipation of litigation or for trial) exempted from discovery by Fed. R. Civ. P. 26(b)(3). Oilpro objects to this request for production because it may include within its scope documents and communications that are exempted from discovery by the attorney-client privilege, joint-defense privilege, and/or the attorney work-product doctrine. Oilpro objects to this request for production because it does not seek documents relevant to any claim or defense in this lawsuit; specifically, Oilpro objects because the request for production is not limited to a relevant time period.

Subject to the foregoing objections and limitations, Oilpro will produce responsive documents for the date range October 1, 2013 – March 29, 2016. Oilpro is currently reviewing and collecting documents within its possession and control and will supplement this response to advise Plaintiffs if it is knowingly withhold-

ing any materials identified in this search on the basis of the objections identified above.

Request for Production No. 27: Please produce all documents and communications (including any attachments thereto) that refer to, relate to, or include the Google Chat conversation dated June 2, 2014 between Estevan Dufrin (estevan@oilpro.com) and Laura Bumby (laura@oilpro.com), in which Estevan Dufrin writes, “I think he just doesn’t want her seeing the rigzone formatted details.”

Response: Oilpro objects to this request for production because it may include within its scope trial-preparation material (documents that are prepared in anticipation of litigation or for trial) exempted from discovery by Fed. R. Civ. P. 26(b)(3). Oilpro objects to this request for production because it may include within its scope documents and communications that are exempted from discovery by the attorney-client privilege, joint-defense privilege, and/or the attorney work-product doctrine. Oilpro objects to this request for production because it does not seek documents relevant to any claim or defense in this lawsuit; specifically, Oilpro objects because the request for production is not limited to a relevant time period.

Subject to the foregoing objections and limitations, Oilpro will produce responsive documents for the date range October 1, 2013 – March 29, 2016. Oilpro is currently reviewing and collecting documents within its possession and control and will supplement this response to advise Plaintiffs if it is knowingly withholding any materials identified in this search on the basis of the objections identified above.

Request for Production No. 28: Please produce all documents and communications (including any attachments thereto) that refer to, relate to, or include the May 12, 2014 2:50 p.m. email from David Kent to Estevan Dufrin.

Response: Oilpro objects to this request for production because it may include within its scope trial-preparation material (documents that are prepared in anticipation of litigation or for trial) exempted from discovery by Fed. R. Civ. P. 26(b)(3). Oilpro objects to this request for production because it may include within its scope documents and communications that are exempted from discovery by the attorney-client privilege, joint-defense privilege, and/or the attorney work-product doctrine. Oilpro objects to this request for production because it does not seek documents relevant to any claim or defense in this lawsuit; specifically, Oilpro objects because the request for production is not limited to a relevant time period.

Subject to the foregoing objections and limitations, Oilpro will produce responsive documents for the date range October 1, 2013 – March 29, 2016. Oilpro is currently reviewing and collecting documents within its possession and control and will supplement this response to advise Plaintiffs if it is knowingly withholding any materials identified in this search on the basis of the objections identified above.

Request for Production No. 29: Please produce all documents and communications (including any attachments thereto) that refer to, relate to, or include the December 16, 2014 email from Laura Bumby (laura@oilpro.com) to Estevan Dufrin (estevan@oilpro.com), in which Laura Bumby writes “if we get the LI license, I could just blast a bunch of people that link just to get their CVs into our system.”

Response: Oilpro objects to this request for production because it may include within its scope trial-preparation material (documents that are prepared in anticipation of litigation or for trial) exempted from discovery by Fed. R. Civ. P. 26(b)(3). Oilpro objects to this request for production because it may include within its scope documents and communications that are exempted from discovery by the attorney-client privilege, joint-defense privilege, and/or the attorney work-product doctrine. Oilpro objects to this request for production because it does not seek documents relevant to any claim or defense in this lawsuit; specifically, Oilpro objects because the request for production is not limited to a relevant time period.

Subject to the foregoing objections and limitations, Oilpro will produce responsive documents for the date range October 1, 2013 – March 29, 2016. Oilpro is currently reviewing and collecting documents within its possession and control and will supplement this response to advise Plaintiffs if it is knowingly withholding any materials identified in this search on the basis of the objections identified above.

Request for Production No. 30: Please produce all documents and communications (including any attachments thereto) that refer to, relate to, or include the December 16, 2014 11:40 a.m. email from Estevan Dufrin (estevan@oilpro.com) to Laura Bumby (laura@oilpro.com) that includes as attachments a PowerPoint presentation titled “ResumeHoard.pptx” and a Word document titled “Operation Resume Hoard.docx.”

Response: Oilpro objects to this request for production because it may include within its scope trial-preparation material (documents that are prepared in anticipation of litigation or for trial) exempted from discovery by Fed. R. Civ. P. 26(b)(3). Oilpro objects to this request for production because it may include within its scope documents and communications that are exempted from discov-

ery by the attorney-client privilege, joint-defense privilege, and/or the attorney work-product doctrine. Oilpro objects to this request for production because it does not seek documents relevant to any claim or defense in this lawsuit; specifically, Oilpro objects because the request for production is not limited to a relevant time period.

Subject to the foregoing objections and limitations, Oilpro will produce responsive documents for the date range October 1, 2013 – March 29, 2016. Oilpro is currently reviewing and collecting documents within its possession and control and will supplement this response to advise Plaintiffs if it is knowingly withholding any materials identified in this search on the basis of the objections identified above.

Request for Production No. 31: Please produce all documents and communications (including any attachments thereto) that refer to, relate to, or include the December 19, 2014 Google Chat conversation between Estevan Dufrin (estevan@oilpro.com) and Laura Bumby (laura@oilpro.com) in which Estevan Dufrin writes, “Hey, did i miss something... 2980 new resumes today?”.

Response: Oilpro objects to this request for production because it may include within its scope trial-preparation material (documents that are prepared in anticipation of litigation or for trial) exempted from discovery by Fed. R. Civ. P. 26(b)(3). Oilpro objects to this request for production because it may include within its scope documents and communications that are exempted from discovery by the attorney-client privilege, joint-defense privilege, and/or the attorney work-product doctrine. Oilpro objects to this request for production because it does not seek documents relevant to any claim or defense in this lawsuit; specifically, Oilpro objects because the request for production is not limited to a relevant time period.

Subject to the foregoing objections and limitations, Oilpro will produce responsive documents for the date range October 1, 2013 – March 29, 2016. Oilpro is currently reviewing and collecting documents within its possession and control and will supplement this response to advise Plaintiffs if it is knowingly withholding any materials identified in this search on the basis of the objections identified above.

Request for Production No. 32: Please produce all documents and communications (including any attachments thereto) that refer to, relate to, or include the March 27, 2015, March 31, 2015, and April 3, 2015 emails between Estevan Dufrin (estevan@oilpro.com) and Laura Bumby (laura@oilpro.com) with the subject line “Operation Resume Hoard Part 1.”

Response: Oilpro objects to this request for production because it may include within its scope trial-preparation material (documents that are prepared in anticipation of litigation or for trial) exempted from discovery by Fed. R. Civ. P. 26(b)(3). Oilpro objects to this request for production because it may include within its scope documents and communications that are exempted from discovery by the attorney-client privilege, joint-defense privilege, and/or the attorney work-product doctrine. Oilpro objects to this request for production because it does not seek documents relevant to any claim or defense in this lawsuit; specifically, Oilpro objects because the request for production is not limited to a relevant time period.

Subject to the foregoing objections and limitations, Oilpro will produce responsive documents for the date range October 1, 2013 – March 29, 2016. Oilpro is currently reviewing and collecting documents within its possession and control and will supplement this response to advise Plaintiffs if it is knowingly withholding any materials identified in this search on the basis of the objections identified above.

Request for Production No. 33: Please produce all documents and communications (including any attachments thereto) that refer to, relate to, or include the April 7, 2015 emails between David Kent (david@oilpro.com), Estevan Dufrin (estevan@oilpro.com), and Laura Bumby (laura@oilpro.com) with the subject line “O&G Job Search.”

Response: Oilpro objects to this request for production because it may include within its scope trial-preparation material (documents that are prepared in anticipation of litigation or for trial) exempted from discovery by Fed. R. Civ. P. 26(b)(3). Oilpro objects to this request for production because it may include within its scope documents and communications that are exempted from discovery by the attorney-client privilege, joint-defense privilege, and/or the attorney work-product doctrine. Oilpro objects to this request for production because it does not seek documents relevant to any claim or defense in this lawsuit; specifically, Oilpro objects because the request for production is not limited to a relevant time period.

Subject to the foregoing objections and limitations, Oilpro will produce responsive documents for the date range October 1, 2013 – March 29, 2016. Oilpro is

currently reviewing and collecting documents within its possession and control and will supplement this response to advise Plaintiffs if it is knowingly withholding any materials identified in this search on the basis of the objections identified above.

Request for Production No. 34: Please produce all documents and communications (including any attachments thereto) that refer to, relate to, or include the April 15, 2015 emails between Laura Bumby (laura@oilpro.com) and Estevan Dufrin (estevan@oilpro.com) with the subject line “Operation CV Hoard -OGJS.”

Response: Oilpro objects to this request for production because it may include within its scope trial-preparation material (documents that are prepared in anticipation of litigation or for trial) exempted from discovery by Fed. R. Civ. P. 26(b)(3). Oilpro objects to this request for production because it may include within its scope documents and communications that are exempted from discovery by the attorney-client privilege, joint-defense privilege, and/or the attorney work-product doctrine. Oilpro objects to this request for production because it does not seek documents relevant to any claim or defense in this lawsuit; specifically, Oilpro objects because the request for production is not limited to a relevant time period.

Subject to the foregoing objections and limitations, Oilpro will produce responsive documents for the date range October 1, 2013 – March 29, 2016. Oilpro is currently reviewing and collecting documents within its possession and control and will supplement this response to advise Plaintiffs if it is knowingly withholding any materials identified in this search on the basis of the objections identified above.

Request for Production No. 35: Please produce all documents and communications (including any attachments thereto) that refer to, relate to, or include the April 15, 2015 emails between David Kent (david@oilpro.com) to Estevan Dufrin (estevan@oilpro.com), in which David Kent writes, “Do you have a problem with downloading resumes? I only ask because you went to DND on Gchat right after I asked you to help with OGJS. If you think someone else should take this, I am all ears.”

Response: Oilpro objects to this request for production because it may include within its scope trial-preparation material (documents that are prepared in anticipation of litigation or for trial) exempted from discovery by Fed. R. Civ. P. 26(b)(3). Oilpro objects to this request for production because it may include within its scope documents and communications that are exempted from discovery by the attorney-client privilege, joint-defense privilege, and/or the attorney work-product doctrine. Oilpro objects to this request for production because it

does not seek documents relevant to any claim or defense in this lawsuit; specifically, Oilpro objects because the request for production is not limited to a relevant time period.

Subject to the foregoing objections and limitations, Oilpro will produce responsive documents for the date range October 1, 2013 – March 29, 2016. Oilpro is currently reviewing and collecting documents within its possession and control and will supplement this response to advise Plaintiffs if it is knowingly withholding any materials identified in this search on the basis of the objections identified above.

Request for Production No. 36: Please produce all documents and communications (including any attachments thereto) that refer to, relate to, or include the April 15, 2015 Google Chat conversation between David Kent (david@oilpro.com) and Estevan Dufrin (estevan@oilpro.com) that David Kent is referencing in the email described in request for production number 32.

Response: Oilpro objects to this request for production because it may include within its scope trial-preparation material (documents that are prepared in anticipation of litigation or for trial) exempted from discovery by Fed. R. Civ. P. 26(b)(3). Oilpro objects to this request for production because it may include within its scope documents and communications that are exempted from discovery by the attorney-client privilege, joint-defense privilege, and/or the attorney work-product doctrine. Oilpro objects to this request for production because it does not seek documents relevant to any claim or defense in this lawsuit; specifically, Oilpro objects because the request for production is not limited to a relevant time period.

Subject to the foregoing objections and limitations, Oilpro will produce responsive documents for the date range October 1, 2013 – March 29, 2016. Oilpro is currently reviewing and collecting documents within its possession and control and will supplement this response to advise Plaintiffs if it is knowingly withholding any materials identified in this search on the basis of the objections identified above.

Request for Production No. 37: Please produce all documents and communications (including any attachments thereto) that refer to, relate to, or include the May 13, 2015 emails between David Kent (david@oilpro.com), Estevan Dufrin (estevan@oilpro.com) and the email address devs@siopco.com with the subject line “LNKD Stats.”

Response: Oilpro objects to this request for production because it may include within its scope trial-preparation material (documents that are prepared in antici-

pation of litigation or for trial) exempted from discovery by Fed. R. Civ. P. 26(b)(3). Oilpro objects to this request for production because it may include within its scope documents and communications that are exempted from discovery by the attorney-client privilege, joint-defense privilege, and/or the attorney work-product doctrine. Oilpro objects to this request for production because it does not seek documents relevant to any claim or defense in this lawsuit; specifically, Oilpro objects because the request for production is not limited to a relevant time period.

Subject to the foregoing objections and limitations, Oilpro will produce responsive documents for the date range October 1, 2013 – March 29, 2016. Oilpro is currently reviewing and collecting documents within its possession and control and will supplement this response to advise Plaintiffs if it is knowingly withholding any materials identified in this search on the basis of the objections identified above.

Request for Production No. 38: Please produce all documents and communications (including any attachments thereto) that refer to, relate to, or include the June 4, 2015 emails between Estevan Dufrin (estevan@oilpro.com) and David Kent (david@oilpro.com) with the subject line “Rusty Emails.”

Response: Oilpro objects to this request for production because it may include within its scope trial-preparation material (documents that are prepared in anticipation of litigation or for trial) exempted from discovery by Fed. R. Civ. P. 26(b)(3). Oilpro objects to this request for production because it may include within its scope documents and communications that are exempted from discovery by the attorney-client privilege, joint-defense privilege, and/or the attorney work-product doctrine. Oilpro objects to this request for production because it does not seek documents relevant to any claim or defense in this lawsuit; specifically, Oilpro objects because the request for production is not limited to a relevant time period.

Subject to the foregoing objections and limitations, Oilpro will produce responsive documents for the date range October 1, 2013 – March 29, 2016. Oilpro is currently reviewing and collecting documents within its possession and control and will supplement this response to advise Plaintiffs if it is knowingly withholding any materials identified in this search on the basis of the objections identified above.

Request for Production No. 39: Please produce all documents and communications (including any attachments thereto) that refer to, relate to, or include the June 11, 2015

emails between Estevan Dufrin (estevan@oilpro.com) and David Kent (david@oilpro.com) with the subject line “Hire him...”

Response: Oilpro objects to this request for production because it may include within its scope trial-preparation material (documents that are prepared in anticipation of litigation or for trial) exempted from discovery by Fed. R. Civ. P. 26(b)(3). Oilpro objects to this request for production because it may include within its scope documents and communications that are exempted from discovery by the attorney-client privilege, joint-defense privilege, and/or the attorney work-product doctrine. Oilpro objects to this request for production because it does not seek documents relevant to any claim or defense in this lawsuit; specifically, Oilpro objects because the request for production is not limited to a relevant time period.

Subject to the foregoing objections and limitations, Oilpro will produce responsive documents for the date range October 1, 2013 – March 29, 2016. Oilpro is currently reviewing and collecting documents within its possession and control and will supplement this response to advise Plaintiffs if it is knowingly withholding any materials identified in this search on the basis of the objections identified above.

Request for Production No. 40: Please produce all documents and communications (including any attachments thereto) that refer to, relate to, or include the June 12, 2015 emails between Estevan Dufrin (estevan@oilpro.com), Laura Bumby (laura@oilpro.com), and Jesse Lisby (jesse@oilpro.com) that are part of an email chain(s) in which Jesse Lisby writes, “I’ll let him know some details so he doesn’t ‘report us to the authorities’ haha.”

Response: Oilpro objects to this request for production because it may include within its scope trial-preparation material (documents that are prepared in anticipation of litigation or for trial) exempted from discovery by Fed. R. Civ. P. 26(b)(3). Oilpro objects to this request for production because it may include within its scope documents and communications that are exempted from discovery by the attorney-client privilege, joint-defense privilege, and/or the attorney work-product doctrine. Oilpro objects to this request for production because it does not seek documents relevant to any claim or defense in this lawsuit; specifically, Oilpro objects because the request for production is not limited to a relevant time period.

Subject to the foregoing objections and limitations, Oilpro will produce responsive documents for the date range October 1, 2013 – March 29, 2016. Oilpro is currently reviewing and collecting documents within its possession and control

and will supplement this response to advise Plaintiffs if it is knowingly withholding any materials identified in this search on the basis of the objections identified above.

Request for Production No. 41: Please produce all documents and communications (including any attachments thereto) that refer to, relate to, or include the June 11, 2015 emails among David Kent (david@oilpro.com) and Estevan Dufrin (estevan@oilpro.com) with the subject line “4th Party.”

Response: Oilpro objects to this request for production because it may include within its scope trial-preparation material (documents that are prepared in anticipation of litigation or for trial) exempted from discovery by Fed. R. Civ. P. 26(b)(3). Oilpro objects to this request for production because it may include within its scope documents and communications that are exempted from discovery by the attorney-client privilege, joint-defense privilege, and/or the attorney work-product doctrine. Oilpro objects to this request for production because it does not seek documents relevant to any claim or defense in this lawsuit; specifically, Oilpro objects because the request for production is not limited to a relevant time period.

Subject to the foregoing objections and limitations, Oilpro will produce responsive documents for the date range October 1, 2013 – March 29, 2016. Oilpro is currently reviewing and collecting documents within its possession and control and will supplement this response to advise Plaintiffs if it is knowingly withholding any materials identified in this search on the basis of the objections identified above.

Request for Production No. 42: Please produce all documents and communications (including any attachments thereto) that refer to, relate to, or include the June 19, 2015 emails between David Kent (david@oilpro.com) and Estevan Dufrin (estevan@oilpro.com) with the subject line “UK.”

Response: Oilpro objects to this request for production because it may include within its scope trial-preparation material (documents that are prepared in anticipation of litigation or for trial) exempted from discovery by Fed. R. Civ. P. 26(b)(3). Oilpro objects to this request for production because it may include within its scope documents and communications that are exempted from discovery by the attorney-client privilege, joint-defense privilege, and/or the attorney work-product doctrine. Oilpro objects to this request for production because it does not seek documents relevant to any claim or defense in this lawsuit; specifically, Oilpro objects because the request for production is not limited to a relevant time period.

Subject to the foregoing objections and limitations, Oilpro will produce responsive documents for the date range October 1, 2013 – March 29, 2016. Oilpro is currently reviewing and collecting documents within its possession and control and will supplement this response to advise Plaintiffs if it is knowingly withholding any materials identified in this search on the basis of the objections identified above.

Request for Production No. 43: Please produce all documents and communications (including any attachments thereto) that refer to, relate to, or include the September 14, 2015 email from Jeremy Antonini (jeremy@oilpro.com) to David Kent (david@oilpro.com), Estevan Dufrin (estevan@oilpro.com), Joseph Triepke (jtriepke@oilpro.com), Jesse Lisby (jesse@oilpro.com), and Laura Bumby (laura@oilpro.com) with the subject line “Soft Member Invite Emails.”

Response: Oilpro objects to this request for production because it may include within its scope trial-preparation material (documents that are prepared in anticipation of litigation or for trial) exempted from discovery by Fed. R. Civ. P. 26(b)(3). Oilpro objects to this request for production because it may include within its scope documents and communications that are exempted from discovery by the attorney-client privilege, joint-defense privilege, and/or the attorney work-product doctrine. Oilpro objects to this request for production because it does not seek documents relevant to any claim or defense in this lawsuit; specifically, Oilpro objects because the request for production is not limited to a relevant time period.

Subject to the foregoing objections and limitations, Oilpro will produce responsive documents for the date range October 1, 2013 – March 29, 2016. Oilpro is currently reviewing and collecting documents within its possession and control and will supplement this response to advise Plaintiffs if it is knowingly withholding any materials identified in this search on the basis of the objections identified above.

Request for Production No. 44: Please produce all documents and communications (including any attachments thereto) that refer to, relate to, or include the September 15, 2015 Google Chat conversation between Estevan Dufrin (estevan@oilpro.com) and Matthew Kent in which Estevan Dufrin writes, “The one that I have no longer works.”

Response: Oilpro objects to this request for production because it may include within its scope trial-preparation material (documents that are prepared in anticipation of litigation or for trial) exempted from discovery by Fed. R. Civ. P. 26(b)(3). Oilpro objects to this request for production because it may include within its scope documents and communications that are exempted from discov-

ery by the attorney-client privilege, joint-defense privilege, and/or the attorney work-product doctrine. Oilpro objects to this request for production because it does not seek documents relevant to any claim or defense in this lawsuit; specifically, Oilpro objects because the request for production is not limited to a relevant time period.

Subject to the foregoing objections and limitations, Oilpro will produce responsive documents for the date range October 1, 2013 – March 29, 2016. Oilpro is currently reviewing and collecting documents within its possession and control and will supplement this response to advise Plaintiffs if it is knowingly withholding any materials identified in this search on the basis of the objections identified above.

Request for Production No. 45: Please produce all documents and communications (including any attachments thereto) that refer to, relate to, or include the September 21, 2015 and September 22, 2015 emails between Estevan Dufrin (estevan@oilpro.com) and Jeremy Antonini (jeremy@oilpro.com) with the subject line “Conversion Stats.”

Response: Oilpro objects to this request for production because it may include within its scope trial-preparation material (documents that are prepared in anticipation of litigation or for trial) exempted from discovery by Fed. R. Civ. P. 26(b)(3). Oilpro objects to this request for production because it may include within its scope documents and communications that are exempted from discovery by the attorney-client privilege, joint-defense privilege, and/or the attorney work-product doctrine. Oilpro objects to this request for production because it does not seek documents relevant to any claim or defense in this lawsuit; specifically, Oilpro objects because the request for production is not limited to a relevant time period.

Subject to the foregoing objections and limitations, Oilpro will produce responsive documents for the date range October 1, 2013 – March 29, 2016. Oilpro is currently reviewing and collecting documents within its possession and control and will supplement this response to advise Plaintiffs if it is knowingly withholding any materials identified in this search on the basis of the objections identified above.

Request for Production No. 46: Please produce all documents and communications (including any attachments thereto) that refer to, relate to, or include the January 29, 2016 emails between Laura Bumby (laura@oilpro.com) and Estevan Dufrin (estevan@oilpro.com) with the subject line “Holly Log-Ins.”

Response: Oilpro objects to this request for production because it may include within its scope trial-preparation material (documents that are prepared in anticipation of litigation or for trial) exempted from discovery by Fed. R. Civ. P. 26(b)(3). Oilpro objects to this request for production because it may include within its scope documents and communications that are exempted from discovery by the attorney-client privilege, joint-defense privilege, and/or the attorney work-product doctrine. Oilpro objects to this request for production because it does not seek documents relevant to any claim or defense in this lawsuit; specifically, Oilpro objects because the request for production is not limited to a relevant time period.

Subject to the foregoing objections and limitations, Oilpro will produce responsive documents for the date range October 1, 2013 – March 29, 2016. Oilpro is currently reviewing and collecting documents within its possession and control and will supplement this response to advise Plaintiffs if it is knowingly withholding any materials identified in this search on the basis of the objections identified above.

Request for Production No. 47: Please produce all documents and communications (including any attachments thereto) that refer to, relate to, or include the March 4, 2016 emails between Estevan Dufrin (estevan@oilpro.com) and Matthew Kent (mkent@stonefortgroup.com) with the subject line “Fwd: holiday.”

Response: Oilpro objects to this request for production because it may include within its scope trial-preparation material (documents that are prepared in anticipation of litigation or for trial) exempted from discovery by Fed. R. Civ. P. 26(b)(3). Oilpro objects to this request for production because it may include within its scope documents and communications that are exempted from discovery by the attorney-client privilege, joint-defense privilege, and/or the attorney work-product doctrine. Oilpro objects to this request for production because it does not seek documents relevant to any claim or defense in this lawsuit; specifically, Oilpro objects because the request for production is not limited to a relevant time period.

Subject to the foregoing objections and limitations, Oilpro will produce responsive documents for the date range October 1, 2013 – March 29, 2016. Oilpro is currently reviewing and collecting documents within its possession and control

and will supplement this response to advise Plaintiffs if it is knowingly withholding any materials identified in this search on the basis of the objections identified above.

Request for Production No. 48: Please produce all documents and communications (including any attachments thereto) that refer to, relate to, or include the March 2016 emails between Estevan Dufrin (estevan@oilpro.com), Matthew Kent (matt@oilpro.com), Brad Smith (brad@virtualbench.net), and Tiffany Neal (tiffany@oilpro.com) with the subject line “Rigzone Bill - \$247.50.”

Response: Oilpro objects to this request for production because it may include within its scope trial-preparation material (documents that are prepared in anticipation of litigation or for trial) exempted from discovery by Fed. R. Civ. P. 26(b)(3). Oilpro objects to this request for production because it may include within its scope documents and communications that are exempted from discovery by the attorney-client privilege, joint-defense privilege, and/or the attorney work-product doctrine. Oilpro objects to this request for production because it does not seek documents relevant to any claim or defense in this lawsuit; specifically, Oilpro objects because the request for production is not limited to a relevant time period.

Subject to the foregoing objections and limitations, Oilpro will produce responsive documents for the date range October 1, 2013 – March 29, 2016. Oilpro is currently reviewing and collecting documents within its possession and control and will supplement this response to advise Plaintiffs if it is knowingly withholding any materials identified in this search on the basis of the objections identified above.

Request for Production No. 49: Please produce all communications and documents sent or received by any Oilpro or Virtual Bench employee named Holly Henderson, Oilpro online account associated with Holly Henderson, and/or fictional person named or referred to as Holly Henderson.

Response: Oilpro objects to this request for production because it may include within its scope trial-preparation material (documents that are prepared in anticipation of litigation or for trial) exempted from discovery by Fed. R. Civ. P. 26(b)(3). Oilpro objects to this request for production because it may include within its scope documents and communications that are exempted from discovery by the attorney-client privilege, joint-defense privilege, and/or the attorney work-product doctrine. Oilpro objects to this request for production because it does not seek documents relevant to any claim or defense in this lawsuit; specifi-

cally, Oilpro objects because the request for production is not limited to a relevant time period.

Subject to the foregoing objections and limitations, Oilpro will produce responsive documents for the date range October 1, 2013 – March 29, 2016. Oilpro is currently reviewing and collecting documents within its possession and control and will supplement this response to advise Plaintiffs if it is knowingly withholding any materials identified in this search on the basis of the objections identified above.

Request for Production No. 50: Please produce all communications and documents referring or relating to any Oilpro or Virtual Bench employee named Holly Henderson, Oilpro online account associated with Holly Henderson, and/or fictional person named or referred to as Holly Henderson.

Response: Oilpro objects to this request for production because it may include within its scope trial-preparation material (documents that are prepared in anticipation of litigation or for trial) exempted from discovery by Fed. R. Civ. P. 26(b)(3). Oilpro objects to this request for production because it may include within its scope documents and communications that are exempted from discovery by the attorney-client privilege, joint-defense privilege, and/or the attorney work-product doctrine. Oilpro objects to this request for production because it does not seek documents relevant to any claim or defense in this lawsuit; specifically, Oilpro objects because the request for production is not limited to a relevant time period.

Subject to the foregoing objections and limitations, Oilpro will produce responsive documents for the date range October 1, 2013 – March 29, 2016. Oilpro is currently reviewing and collecting documents within its possession and control and will supplement this response to advise Plaintiffs if it is knowingly withholding any materials identified in this search on the basis of the objections identified above.

Request for Production No. 51: Please produce all communications and documents sent or received by any Oilpro or Virtual Bench employee named Heather Sullivan, Oilpro online account associated with Heather Sullivan, and/or fictional person named or referred to as Heather Sullivan.

Response: Oilpro objects to this request for production because it may include within its scope trial-preparation material (documents that are prepared in anticipation of litigation or for trial) exempted from discovery by Fed. R. Civ. P. 26(b)(3). Oilpro objects to this request for production because it may include

within its scope documents and communications that are exempted from discovery by the attorney-client privilege, joint-defense privilege, and/or the attorney work-product doctrine. Oilpro objects to this request for production because it does not seek documents relevant to any claim or defense in this lawsuit; specifically, Oilpro objects because the request for production is not limited to a relevant time period.

Subject to the foregoing objections and limitations, Oilpro will produce responsive documents for the date range October 1, 2013 – March 29, 2016. Oilpro is currently reviewing and collecting documents within its possession and control and will supplement this response to advise Plaintiffs if it is knowingly withholding any materials identified in this search on the basis of the objections identified above.

Request for Production No. 52: Please produce all communications and documents referring or relating to any Oilpro or Virtual Bench employee named Heather Sullivan, Oilpro online account associated with Heather Sullivan, and/or fictional person named or referred to as Heather Sullivan.

Response: Oilpro objects to this request for production because it may include within its scope trial-preparation material (documents that are prepared in anticipation of litigation or for trial) exempted from discovery by Fed. R. Civ. P. 26(b)(3). Oilpro objects to this request for production because it may include within its scope documents and communications that are exempted from discovery by the attorney-client privilege, joint-defense privilege, and/or the attorney work-product doctrine. Oilpro objects to this request for production because it does not seek documents relevant to any claim or defense in this lawsuit; specifically, Oilpro objects because the request for production is not limited to a relevant time period.

Subject to the foregoing objections and limitations, Oilpro will produce responsive documents for the date range October 1, 2013 – March 29, 2016. Oilpro is currently reviewing and collecting documents within its possession and control and will supplement this response to advise Plaintiffs if it is knowingly withholding any materials identified in this search on the basis of the objections identified above.

Request for Production No. 53: Please produce all communications and documents sent or received by any Oilpro or Virtual Bench employee named Jennifer Green, Oilpro online account associated with Jennifer Green, and/or fictional person named or referred to as Jennifer Green.

Response: Oilpro objects to this request for production because it may include within its scope trial-preparation material (documents that are prepared in anticipation of litigation or for trial) exempted from discovery by Fed. R. Civ. P. 26(b)(3). Oilpro objects to this request for production because it may include within its scope documents and communications that are exempted from discovery by the attorney-client privilege, joint-defense privilege, and/or the attorney work-product doctrine. Oilpro objects to this request for production because it does not seek documents relevant to any claim or defense in this lawsuit; specifically, Oilpro objects because the request for production is not limited to a relevant time period.

Subject to the foregoing objections and limitations, Oilpro will produce responsive documents for the date range October 1, 2013 – March 29, 2016. Oilpro is currently reviewing and collecting documents within its possession and control and will supplement this response to advise Plaintiffs if it is knowingly withholding any materials identified in this search on the basis of the objections identified above.

Request for Production No. 54: Please produce all communications and documents referring or relating to any Oilpro or Virtual Bench employee named Jennifer Green, Oilpro online account associated with Jennifer Green, and/or fictional person named or referred to as Jennifer Green.

Response: Oilpro objects to this request for production because it may include within its scope trial-preparation material (documents that are prepared in anticipation of litigation or for trial) exempted from discovery by Fed. R. Civ. P. 26(b)(3). Oilpro objects to this request for production because it may include within its scope documents and communications that are exempted from discovery by the attorney-client privilege, joint-defense privilege, and/or the attorney work-product doctrine. Oilpro objects to this request for production because it does not seek documents relevant to any claim or defense in this lawsuit; specifically, Oilpro objects because the request for production is not limited to a relevant time period.

Subject to the foregoing objections and limitations, Oilpro will produce responsive documents for the date range October 1, 2013 – March 29, 2016. Oilpro is currently reviewing and collecting documents within its possession and control

and will supplement this response to advise Plaintiffs if it is knowingly withholding any materials identified in this search on the basis of the objections identified above.

Request for Production No. 55: Please produce all communications and documents sent or received by any Oilpro or Virtual Bench employee named Sarah Young, Oilpro online account associated with Sarah Young, and/or fictional person named or referred to as Sarah Young.

Response: Oilpro objects to this request for production because it may include within its scope trial-preparation material (documents that are prepared in anticipation of litigation or for trial) exempted from discovery by Fed. R. Civ. P. 26(b)(3). Oilpro objects to this request for production because it may include within its scope documents and communications that are exempted from discovery by the attorney-client privilege, joint-defense privilege, and/or the attorney work-product doctrine. Oilpro objects to this request for production because it does not seek documents relevant to any claim or defense in this lawsuit; specifically, Oilpro objects because the request for production is not limited to a relevant time period.

Subject to the foregoing objections and limitations, Oilpro will produce responsive documents for the date range October 1, 2013 – March 29, 2016. Oilpro is currently reviewing and collecting documents within its possession and control and will supplement this response to advise Plaintiffs if it is knowingly withholding any materials identified in this search on the basis of the objections identified above.

Request for Production No. 56: Please produce all communications and documents referring or relating to any Oilpro or Virtual Bench employee named Sarah Young, Oilpro online account associated with Sarah Young, and/or fictional person named or referred to as Sarah Young.

Response: Oilpro objects to this request for production because it may include within its scope trial-preparation material (documents that are prepared in anticipation of litigation or for trial) exempted from discovery by Fed. R. Civ. P. 26(b)(3). Oilpro objects to this request for production because it may include within its scope documents and communications that are exempted from discovery by the attorney-client privilege, joint-defense privilege, and/or the attorney work-product doctrine. Oilpro objects to this request for production because it does not seek documents relevant to any claim or defense in this lawsuit; specifically, Oilpro objects because the request for production is not limited to a relevant time period.

Subject to the foregoing objections and limitations, Oilpro will produce responsive documents for the date range October 1, 2013 – March 29, 2016. Oilpro is currently reviewing and collecting documents within its possession and control and will supplement this response to advise Plaintiffs if it is knowingly withholding any materials identified in this search on the basis of the objections identified above.

Request for Production No. 57: Please produce all Electronic Devices, including any complete or partial copies of Electronic Devices, that contain and/or contained Rigzone Information or compilations of data relating to Rigzone's past, current, and/or prospective customers.

Response: Oilpro objects to this request for production because it does not seek documents relevant to any claim or defense in this lawsuit. Oilpro further objects to this request for production because it fails to identify the requested materials with reasonable particularity as required by FED. R. CIV. P. 34(b). Oilpro further objects to this request for production because it seeks to impose an undue burden and expense that outweighs its likely benefit, and is not proportional to the needs of the case pursuant to FED. R. CIV. P. 26(b)(1). Oilpro further objects to this request for production because it may include within its scope documents that are outside its possession and control.

Request for Production No. 58: Please produce all Electronic Devices, including any complete or partial copies of Electronic Devices, that contain and/or contained the identities and/or contact information of Rigzone's past, current, and/or prospective members.

Response: Oilpro objects to this request for production because it does not seek documents relevant to any claim or defense in this lawsuit. Oilpro further objects to this request for production because it fails to identify the requested materials with reasonable particularity as required by FED. R. CIV. P. 34(b). Oilpro further objects to this request for production because it seeks to impose an undue burden and expense that outweighs its likely benefit, and is not proportional to the needs of the case pursuant to FED. R. CIV. P. 26(b)(1). Oilpro further objects to this request for production because it may include within its scope documents that are outside its possession and control.

Request for Production No. 59: Please produce all Electronic Devices, including any complete or partial copies of Electronic Devices, that contain and/or contained the resumes of Rigzone's past, current, and/or prospective members.

Response: Oilpro objects to this request for production because it does not seek documents relevant to any claim or defense in this lawsuit. Oilpro further objects

to this request for production because it fails to identify the requested materials with reasonable particularity as required by FED. R. CIV. P. 34(b). Oilpro further objects to this request for production because it seeks to impose an undue burden and expense that outweighs its likely benefit, and is not proportional to the needs of the case pursuant to FED. R. CIV. P. 26(b)(1). Oilpro further objects to this request for production because it may include within its scope documents that are outside its possession and control.

Request for Production No. 60: Please produce all Electronic Devices, including any complete or partial copies of Electronic Devices, that contain and/or contained documents, data, or information from Rigzone's Google Analytics account or DHI Group's Google Analytics account.

Response: Oilpro objects to this request for production because it does not seek documents relevant to any claim or defense in this lawsuit. Oilpro further objects to this request for production because it fails to identify the requested materials with reasonable particularity as required by FED. R. CIV. P. 34(b). Oilpro further objects to this request for production because it seeks to impose an undue burden and expense that outweighs its likely benefit, and is not proportional to the needs of the case pursuant to FED. R. CIV. P. 26(b)(1). Oilpro further objects to this request for production because it may include within its scope documents that are outside its possession and control.

Request for Production No. 61: Please produce the "Third Party Resume Database."

Response: Oilpro objects to this request for production because it does not seek documents relevant to any claim or defense in this lawsuit. Oilpro further objects to this request for production because it fails to identify the requested materials with reasonable particularity as required by FED. R. CIV. P. 34(b). Oilpro further objects to this request for production because it seeks to impose an undue burden and expense that outweighs its likely benefit, and is not proportional to the needs of the case pursuant to FED. R. CIV. P. 26(b)(1). Oilpro further objects to this request for production because it may include within its scope documents that are outside its possession and control.

Request for Production No. 62: Please produce all documents related to or containing any Rigzone Information.

Response: Oilpro objects to this request for production because it does not seek documents relevant to any claim or defense in this lawsuit. Oilpro further objects to this request for production because it fails to identify the requested materials with reasonable particularity as required by FED. R. CIV. P. 34(b). Oilpro further

objects to this request for production because it seeks to impose an undue burden and expense that outweighs its likely benefit, and is not proportional to the needs of the case pursuant to FED. R. CIV. P. 26(b)(1). Oilpro further objects to this request for production because it may include within its scope documents that are outside its possession and control.

Request for Production No. 63: Please produce all documents related to or containing any of Rigzone's past, current, and/or prospective members.

Response: Oilpro objects to this request for production because it does not seek documents relevant to any claim or defense in this lawsuit. Oilpro further objects to this request for production because it fails to identify the requested materials with reasonable particularity as required by FED. R. CIV. P. 34(b). Oilpro further objects to this request for production because it seeks to impose an undue burden and expense that outweighs its likely benefit, and is not proportional to the needs of the case pursuant to FED. R. CIV. P. 26(b)(1). Oilpro further objects to this request for production because it may include within its scope documents that are outside its possession and control.

Request for Production No. 64: Please produce all documents related to or containing any portion of Rigzone's Member Database.

Response: Oilpro objects to this request for production because it does not seek documents relevant to any claim or defense in this lawsuit. Oilpro further objects to this request for production because it fails to identify the requested materials with reasonable particularity as required by FED. R. CIV. P. 34(b). Oilpro further objects to this request for production because it seeks to impose an undue burden and expense that outweighs its likely benefit, and is not proportional to the needs of the case pursuant to FED. R. CIV. P. 26(b)(1). Oilpro further objects to this request for production because it may include within its scope documents that are outside its possession and control.

Request for Production No. 65: Please produce all documents related to or containing any documents, data, or information from Rigzone's Google Analytics account or DHI Group's Google Analytics account.

Response: Oilpro objects to this request for production because it may include within its scope documents and communications that are exempted from discovery by the attorney-client privilege, joint-defense privilege, and/or the attorney work-product doctrine. Oilpro objects to this request for production because it may include within its scope trial-preparation material (documents that are prepared in anticipation of litigation or for trial) exempted from discovery by Fed. R.

Civ. P. 26(b)(3). Oilpro objects to this request for production because it does not seek documents relevant to any claim or defense in this lawsuit.

Subject to the foregoing objections and limitations, Oilpro will produce responsive documents for the date range October 1, 2013 – March 29, 2016. Oilpro is currently reviewing and collecting documents within its possession and control and will supplement this response to advise Plaintiffs if it is knowingly withholding any materials identified in this search on the basis of the objections identified above.

Request for Production No. 66: Please produce a copy of Oilpro's Member Database.

Response: Oilpro objects to this request for production because it does not seek documents relevant to any claim or defense in this lawsuit; specifically, Oilpro objects because the request for production is not limited to a relevant time period. Please produce all documents related to Oilpro's strategies and/or efforts to acquire members. Oilpro objects to this request for production because it fails to identify the requested materials with reasonable particularity as required by FED. R. CIV. P. 34(b). Oilpro objects to this request for production because it may include within its scope documents that are outside its possession and control.

Request for Production No. 67: Please produce all documents related to Oilpro's strategies and/or efforts to acquire members.

Response: Oilpro objects to this request for production because it does not seek documents relevant to any claim or defense in this lawsuit; specifically, Oilpro objects because the request for production is not limited to a relevant time period. Please produce all documents related to Oilpro's strategies and/or efforts to acquire members. Oilpro objects to this request for production because it fails to identify the requested materials with reasonable particularity as required by FED. R. CIV. P. 34(b). Oilpro objects to this request for production because it may include within its scope documents that are outside its possession and control.

Request for Production No. 68: Please produce all communications referring or relating to Rigzone or DHI Group sent to, sent from, or copying one or more of the Defendants.

Response: Oilpro objects to this request for production because it does not seek documents relevant to any claim or defense in this lawsuit; specifically, Oilpro objects because the request for production is not limited to a relevant time period. Oilpro further objects to this request for production because it seeks to impose an undue burden and expense that outweighs its likely benefit, and is not proportional to the needs of the case pursuant to FED. R. CIV. P. 26(b)(1). Oilpro further

objects to this request for production because it may include within its scope documents and communications that are exempted from discovery by the attorney-client privilege, joint-defense privilege, and/or the attorney work-product doctrine. Oilpro objects to this request for production because it may include within its scope trial-preparation material (documents that are prepared in anticipation of litigation or for trial) exempted from discovery by Fed. R. Civ. P. 26(b)(3).

Subject to the foregoing objections and limitations, Oilpro will produce responsive documents for the date range October 1, 2013 – March 29, 2016. Oilpro is currently reviewing and collecting documents within its possession and control and will supplement this response to advise Plaintiffs if it is knowingly withholding any materials identified in this search on the basis of the objections identified above.

Request for Production No. 69: Please produce all communications with Rigzone or DHI Group, including without limitation those emails sent by David W. Kent, Jr. to DHI Group on or about April 24, 2014, between October 24, 2015 and November 14, 2015, on or about November 25, 2015, on or about December 8, 2015, and on or about January 27, 2016.

Response: Oilpro objects to this request for production because it does not seek documents relevant to any claim or defense in this lawsuit; specifically, Oilpro objects because the request for production is not limited to a relevant time period. Oilpro objects to this request for production because it seeks to impose an undue burden and expense that outweighs its likely benefit, and is not proportional to the needs of the case pursuant to FED. R. CIV. P. 26(b)(1).

Subject to the foregoing objections and limitations, Oilpro will produce responsive produce communications sent by David W. Kent, Jr. to Rigzone or DHI Group on or about April 24, 2014, between October 24, 2015 and November 14, 2015, on or about November 25, 2015, on or about December 8, 2015, and on or about January 27, 2016. Oilpro is currently reviewing and collecting documents within its possession and control and will supplement this response to advise Plaintiffs if it is knowingly withholding any materials identified in this search on the basis of the objections identified above.

Request for Production No. 70: Please produce documents sufficient to identify the IP Addresses for all Electronic Devices used by you between January 1, 2013 and present.

Response: Oilpro objects to this request for production because it does not seek documents relevant to any claim or defense in this lawsuit. Oilpro objects to this request for production because it fails to identify the requested materials with rea-

sonable particularity as required by FED. R. CIV. P. 34(b). Oilpro objects to this request for production because it seeks to impose an undue burden and expense that outweighs its likely benefit, and is not proportional to the needs of the case pursuant to FED. R. CIV. P. 26(b)(1).

Request for Production No. 71: Please produce Oilpro's organizational chart(s) since January 1, 2013.

Response: Oilpro is currently reviewing and collecting documents within its possession and control and Oilpro will produce any responsive documents it discovers.

Request for Production No. 72: Please produce all documents that refer or relate to the "countdown" for the Oilpro website.

Response: Oilpro objects to this request for production because it may include within its scope documents and communications that are exempted from discovery by the attorney-client privilege, joint-defense privilege, and/or the attorney work-product doctrine. Oilpro objects to this request for production because it may include within its scope trial-preparation material (documents that are prepared in anticipation of litigation or for trial) exempted from discovery by Fed. R. Civ. P. 26(b)(3).

Subject to the foregoing objections and limitations, Oilpro will produce responsive documents for the date range October 1, 2013 – March 29, 2016. Oilpro is currently reviewing and collecting documents within its possession and control and will supplement this response to advise Plaintiffs if it is knowingly withholding any materials identified in this search on the basis of the objections identified above.

Request for Production No. 73: Please produce any employment agreements with David W. Kent, Jr.

Response: Oilpro is currently reviewing and collecting documents within its possession and control and Oilpro will produce any responsive documents it discovers.

Request for Production No. 74: Please produce any employment agreements with Estevan Dufrin.

Response: Oilpro is currently reviewing and collecting documents within its possession and control and Oilpro will produce any responsive documents it discovers.

Request for Production No. 75: Please produce any employment agreements with Matthew Kent.

Response: Oilpro is currently reviewing and collecting documents within its possession and control and Oilpro will produce any responsive documents it discovers.

Request for Production No. 76: Please produce any employment agreements with Bryan Robins.

Response: Oilpro is currently reviewing and collecting documents within its possession and control and Oilpro will produce any responsive documents it discovers.

Request for Production No. 77: Please produce any employment agreements with Jeremy Antonini.

Response: Oilpro is currently reviewing and collecting documents within its possession and control and Oilpro will produce any responsive documents it discovers.

Request for Production No. 78: Please produce any employment agreements with Laura Bumby.

Response: Oilpro is currently reviewing and collecting documents within its possession and control and Oilpro will produce any responsive documents it discovers.

Request for Production No. 79: Please produce any employment agreements with Joseph Triepke.

Response: Oilpro is currently reviewing and collecting documents within its possession and control and Oilpro will produce any responsive documents it discovers.

Request for Production No. 80: Please produce any severance and/or termination agreements with Estevan Dufrin.

Response: Oilpro is currently reviewing and collecting documents within its possession and control and Oilpro will produce any responsive documents it discovers.

Request for Production No. 81: Please produce any severance and/or termination agreements with Matthew Kent.

Response: Oilpro is currently reviewing and collecting documents within its possession and control and Oilpro will produce any responsive documents it discovers.

Request for Production No. 82: Please produce any severance and/or termination agreements with Bryan Robins.

Response: Oilpro is currently reviewing and collecting documents within its possession and control and Oilpro will produce any responsive documents it discovers.

Request for Production No. 83: Please produce any severance and/or termination agreements with Jeremy Antonini.

Response: Oilpro is currently reviewing and collecting documents within its possession and control and Oilpro will produce any responsive documents it discovers.

Request for Production No. 84: Please produce any severance and/or termination agreements with Laura Bumby.

Response: Oilpro is currently reviewing and collecting documents within its possession and control and Oilpro will produce any responsive documents it discovers.

Request for Production No. 85: Please produce any severance and/or termination agreements with Joseph Triepke.

Response: Oilpro is currently reviewing and collecting documents within its possession and control and Oilpro will produce any responsive documents it discovers.

Request for Production No. 86: Please produce any stock option agreements with Estevan Dufrin.

Response: Oilpro is currently reviewing and collecting documents within its possession and control and Oilpro will produce any responsive documents it discovers.

Request for Production No. 87: Please produce any stock option agreements with Matthew Kent.

Response: Oilpro is currently reviewing and collecting documents within its possession and control and Oilpro will produce any responsive documents it discovers.

Request for Production No. 88: Please produce any stock option agreements with Bryan Robins.

Response: Oilpro is currently reviewing and collecting documents within its possession and control and Oilpro will produce any responsive documents it discovers.

Request for Production No. 89: Please produce any stock option agreements with Jeremy Antonini.

Response: Oilpro is currently reviewing and collecting documents within its possession and control and Oilpro will produce any responsive documents it discovers.

Request for Production No. 90: Please produce any stock option agreements with Laura Bumby.

Response: Oilpro is currently reviewing and collecting documents within its possession and control and Oilpro will produce any responsive documents it discovers.

Request for Production No. 91: Please produce any stock option agreements with Joseph Triepke.

Response: Oilpro is currently reviewing and collecting documents within its possession and control and Oilpro will produce any responsive documents it discovers.

Request for Production No. 92: Please produce any stay bonus agreements with Estevan Dufrin.

Response: Oilpro is currently reviewing and collecting documents within its possession and control and Oilpro will produce any responsive documents it discovers.

Request for Production No. 93: Please produce any stay bonus agreements with Matthew Kent.

Response: Oilpro is currently reviewing and collecting documents within its possession and control and Oilpro will produce any responsive documents it discovers.

Request for Production No. 94: Please produce any stay bonus agreements with Bryan Robins.

Response: Oilpro is currently reviewing and collecting documents within its possession and control and Oilpro will produce any responsive documents it discovers.

Request for Production No. 95: Please produce any stay bonus agreements with Jeremy Antonini.

Response: Oilpro is currently reviewing and collecting documents within its possession and control and Oilpro will produce any responsive documents it discovers.

Request for Production No. 96: Please produce any stay bonus agreements with Laura Bumby.

Response: Oilpro is currently reviewing and collecting documents within its possession and control and Oilpro will produce any responsive documents it discovers.

Request for Production No. 97: Please produce any stay bonus agreements with Joseph Triepke.

Response: Oilpro is currently reviewing and collecting documents within its possession and control and Oilpro will produce any responsive documents it discovers.

Request for Production No. 98: Please produce any documents or communications regarding the departure from Oilpro of Estevan Dufrin.

Response: Oilpro objects to this request for production because it may include within its scope documents and communications that are exempted from discovery by the attorney-client privilege, joint-defense privilege, and/or the attorney work-product doctrine. Oilpro further objects to this request for production because it may include within its scope trial-preparation material (documents that

are prepared in anticipation of litigation or for trial) exempted from discovery by Fed. R. Civ. P. 26(b)(3). Oilpro further objects to this request for production because it does not seek documents relevant to any claim or defense in this lawsuit; specifically, Oilpro objects because the request for production is not limited to a relevant time period.

Subject to the foregoing objections and limitations, Oilpro will produce responsive documents for the date range October 1, 2013 – March 29, 2016. Oilpro is currently reviewing and collecting documents within its possession and control and will supplement this response to advise Plaintiffs if it is knowingly withholding any materials identified in this search on the basis of the objections identified above.

Request for Production No. 99: Please produce any documents or communications regarding the departure from Oilpro of Matthew Kent.

Response: Oilpro objects to this request for production because it may include within its scope documents and communications that are exempted from discovery by the attorney-client privilege, joint-defense privilege, and/or the attorney work-product doctrine. Oilpro further objects to this request for production because it may include within its scope trial-preparation material (documents that are prepared in anticipation of litigation or for trial) exempted from discovery by Fed. R. Civ. P. 26(b)(3). Oilpro further objects to this request for production because it does not seek documents relevant to any claim or defense in this lawsuit; specifically, Oilpro objects because the request for production is not limited to a relevant time period.

Subject to the foregoing objections and limitations, Oilpro will produce responsive documents for the date range October 1, 2013 – March 29, 2016. Oilpro is currently reviewing and collecting documents within its possession and control and will supplement this response to advise Plaintiffs if it is knowingly withholding any materials identified in this search on the basis of the objections identified above.

Request for Production No. 100: Please produce any documents or communications regarding the departure from Oilpro of Bryan Robins.

Response: Oilpro objects to this request for production because it may include within its scope documents and communications that are exempted from discovery by the attorney-client privilege, joint-defense privilege, and/or the attorney work-product doctrine. Oilpro further objects to this request for production because it may include within its scope trial-preparation material (documents that

are prepared in anticipation of litigation or for trial) exempted from discovery by Fed. R. Civ. P. 26(b)(3). Oilpro further objects to this request for production because it does not seek documents relevant to any claim or defense in this lawsuit; specifically, Oilpro objects because the request for production is not limited to a relevant time period.

Subject to the foregoing objections and limitations, Oilpro will produce responsive documents for the date range October 1, 2013 – March 29, 2016. Oilpro is currently reviewing and collecting documents within its possession and control and will supplement this response to advise Plaintiffs if it is knowingly withholding any materials identified in this search on the basis of the objections identified above.

Request for Production No. 101: Please produce any documents or communications regarding the departure from Oilpro of Jeremy Antonini.

Response: Oilpro objects to this request for production because it may include within its scope documents and communications that are exempted from discovery by the attorney-client privilege, joint-defense privilege, and/or the attorney work-product doctrine. Oilpro further objects to this request for production because it may include within its scope trial-preparation material (documents that are prepared in anticipation of litigation or for trial) exempted from discovery by Fed. R. Civ. P. 26(b)(3). Oilpro further objects to this request for production because it does not seek documents relevant to any claim or defense in this lawsuit; specifically, Oilpro objects because the request for production is not limited to a relevant time period.

Subject to the foregoing objections and limitations, Oilpro will produce responsive documents for the date range October 1, 2013 – March 29, 2016. Oilpro is currently reviewing and collecting documents within its possession and control and will supplement this response to advise Plaintiffs if it is knowingly withholding any materials identified in this search on the basis of the objections identified above.

Request for Production No. 102: Please produce any documents or communications regarding the departure from Oilpro of Laura Bumby.

Response: Oilpro objects to this request for production because it may include within its scope documents and communications that are exempted from discovery by the attorney-client privilege, joint-defense privilege, and/or the attorney work-product doctrine. Oilpro further objects to this request for production because it may include within its scope trial-preparation material (documents that

are prepared in anticipation of litigation or for trial) exempted from discovery by Fed. R. Civ. P. 26(b)(3). Oilpro further objects to this request for production because it does not seek documents relevant to any claim or defense in this lawsuit; specifically, Oilpro objects because the request for production is not limited to a relevant time period.

Subject to the foregoing objections and limitations, Oilpro will produce responsive documents for the date range October 1, 2013 – March 29, 2016. Oilpro is currently reviewing and collecting documents within its possession and control and will supplement this response to advise Plaintiffs if it is knowingly withholding any materials identified in this search on the basis of the objections identified above.

Request for Production No. 103: Please produce any documents or communications regarding the departure from Oilpro of Jesse Lisby.

Response: Oilpro objects to this request for production because it may include within its scope documents and communications that are exempted from discovery by the attorney-client privilege, joint-defense privilege, and/or the attorney work-product doctrine. Oilpro further objects to this request for production because it may include within its scope trial-preparation material (documents that are prepared in anticipation of litigation or for trial) exempted from discovery by Fed. R. Civ. P. 26(b)(3). Oilpro further objects to this request for production because it does not seek documents relevant to any claim or defense in this lawsuit; specifically, Oilpro objects because the request for production is not limited to a relevant time period.

Subject to the foregoing objections and limitations, Oilpro will produce responsive documents for the date range October 1, 2013 – March 29, 2016. Oilpro is currently reviewing and collecting documents within its possession and control and will supplement this response to advise Plaintiffs if it is knowingly withholding any materials identified in this search on the basis of the objections identified above.

Request for Production No. 104: Please produce any documents or communications regarding the departure from Oilpro of Joseph Triepke.

Response: Oilpro objects to this request for production because it may include within its scope documents and communications that are exempted from discovery by the attorney-client privilege, joint-defense privilege, and/or the attorney work-product doctrine. Oilpro further objects to this request for production because it may include within its scope trial-preparation material (documents that

are prepared in anticipation of litigation or for trial) exempted from discovery by Fed. R. Civ. P. 26(b)(3). Oilpro further objects to this request for production because it does not seek documents relevant to any claim or defense in this lawsuit; specifically, Oilpro objects because the request for production is not limited to a relevant time period.

Subject to the foregoing objections and limitations, Oilpro will produce responsive documents for the date range October 1, 2013 – March 29, 2016. Oilpro is currently reviewing and collecting documents within its possession and control and will supplement this response to advise Plaintiffs if it is knowingly withholding any materials identified in this search on the basis of the objections identified above.

Request for Production No. 105: Please produce your insurance policies.

Response: Oilpro objects to this request for production because it does not seek documents relevant to any claim or defense in this lawsuit. Subject to the foregoing objection, Oilpro is currently reviewing and collecting documents within its possession and control and will supplement this response to advise Plaintiffs if it is knowingly withholding any materials identified in this search on the basis of the objections identified above.

Subject to the foregoing objection, Oilpro is currently reviewing and collecting documents within its possession and control and will supplement this response to advise Plaintiffs if it is knowingly withholding any materials identified in this search on the basis of the objections identified above.

Request for Production No. 106: Please produce any correspondence with your insurers regarding this Lawsuit.

Response: Oilpro objects to this request for production because it does not seek documents relevant to any claim or defense in this lawsuit. Oilpro objects to this request for production because it may include within its scope trial-preparation material (documents that are prepared in anticipation of litigation or for trial) exempted from discovery by Fed. R. Civ. P. 26(b)(3). Oilpro objects to this request for production because it may include within its scope documents and communications that are exempted from discovery by the attorney-client privilege, joint-defense privilege, and/or the attorney work-product doctrine.

Request for Production No. 107: Please produce any indemnity agreements regarding this Lawsuit.

Response: Oilpro is currently reviewing and collecting documents within its possession and control and Oilpro will produce any responsive documents it discovers.

Request for Production No. 108: Please produce any documents or communications referring or relating to indemnity agreements applicable to this Lawsuit or the claims asserted in this Lawsuit.

Response: Oilpro objects to this request for production because it does not seek documents relevant to any claim or defense in this lawsuit. Oilpro objects to this request for production because it may include within its scope trial-preparation material (documents that are prepared in anticipation of litigation or for trial) exempted from discovery by Fed. R. Civ. P. 26(b)(3). Oilpro objects to this request for production because it may include within its scope documents and communications that are exempted from discovery by the attorney-client privilege, joint-defense privilege, and/or the attorney work-product doctrine.

Subject to the foregoing objection, Oilpro is currently reviewing and collecting documents within its possession and control and will supplement this response to advise Plaintiffs if it is knowingly withholding any materials identified in this search on the basis of the objections identified above.

Request for Production No. 109: Please produce any documents or communications referring or relating to the payment of attorneys' fees or any proposed payment of attorneys' fees for Estevan Dufrin, Bryan Robins, Matthew Kent, Joseph Triepke, Laura Bumby or any other current or former Oilpro employee in connection with the Federal Complaint, Federal Information, or any criminal investigation performed in connection with the Federal Complaint, Federal Information, or the allegations contained in those documents.

Response: Oilpro objects to this request for production because it does not seek documents relevant to any claim or defense in this lawsuit. Oilpro objects to this request for production because it may include within its scope trial-preparation material (documents that are prepared in anticipation of litigation or for trial) exempted from discovery by Fed. R. Civ. P. 26(b)(3). Oilpro objects to this request for production because it may include within its scope documents and communications that are exempted from discovery by the attorney-client privilege, joint-defense privilege, and/or the attorney work-product doctrine.

Subject to the foregoing objections and limitations, Oilpro will produce any agreements with Estevan Dufrin, Bryan Robins, Matthew Kent, Joseph Triepke, Laura Bumby, and any other current or former Oilpro employee regarding the payment of attorneys' fees in connection with the Federal Complaint. Oilpro is currently reviewing and collecting documents within its possession and control and will supplement this response to advise Plaintiffs if it is knowingly withholding any materials identified in this search on the basis of the objections identified above.

Request for Production No. 110: Please produce any documents or communications referring or relating to the payment of attorneys' fees or any proposed payment of attorneys' fees for Estevan Dufrin, Bryan Robins, Matthew Kent, Joseph Triepke, Laura Bumby or any other current or former Oilpro employee in connection with this Lawsuit.

Response: Oilpro objects to this request for production because it does not seek documents relevant to any claim or defense in this lawsuit. Oilpro objects to this request for production because it may include within its scope trial-preparation material (documents that are prepared in anticipation of litigation or for trial) exempted from discovery by Fed. R. Civ. P. 26(b)(3). Oilpro objects to this request for production because it may include within its scope documents and communications that are exempted from discovery by the attorney-client privilege, joint-defense privilege, and/or the attorney work-product doctrine.

Subject to the foregoing objections and limitations, Oilpro will produce any agreements with Estevan Dufrin, Bryan Robins, Matthew Kent, Joseph Triepke, Laura Bumby, and any other current or former Oilpro employee regarding the payment of attorneys' fees in connection with this Lawsuit. Oilpro is currently reviewing and collecting documents within its possession and control and will supplement this response to advise Plaintiffs if it is knowingly withholding any materials identified in this search on the basis of the objections identified above. .

Request for Production No. 111: Please produce any communications with Jonathan Fairbanks and/or his family trusts referring or relating to the Federal Complaint, Federal Information, or any criminal investigation performed in connection with the Federal Complaint, Federal Information, or the allegations contained in those documents.

Response: Oilpro objects to this request for production because it may include within its scope trial-preparation material (documents that are prepared in anticipation of litigation or for trial) exempted from discovery by Fed. R. Civ. P. 26(b)(3). Oilpro objects to this request for production because it may include within its scope documents and communications that are exempted from discovery by the attorney-client privilege, joint-defense privilege, and/or the attorney

work-product doctrine. Oilpro objects to this request for production because it does not seek documents relevant to any claim or defense in this lawsuit.

Request for Production No. 112: Please produce any communications with Jonathan Fairbanks and/or his family trusts regarding this Lawsuit.

Response: Oilpro objects to this request for production because it may include within its scope trial-preparation material (documents that are prepared in anticipation of litigation or for trial) exempted from discovery by Fed. R. Civ. P. 26(b)(3). Oilpro objects to this request for production because it may include within its scope documents and communications that are exempted from discovery by the attorney-client privilege, joint-defense privilege, and/or the attorney work-product doctrine. Oilpro objects to this request for production because it does not seek documents relevant to any claim or defense in this lawsuit.

Request for Production No. 113: Please produce any communications with Jonathan Fairbanks and/or his family trusts since January 1, 2016 that refer or relate to his investment in Oilpro.

Response: Oilpro objects to this request for production because it may include within its scope trial-preparation material (documents that are prepared in anticipation of litigation or for trial) exempted from discovery by Fed. R. Civ. P. 26(b)(3). Oilpro objects to this request for production because it may include within its scope documents and communications that are exempted from discovery by the attorney-client privilege, joint-defense privilege, and/or the attorney work-product doctrine. Oilpro objects to this request for production because it does not seek documents relevant to any claim or defense in this lawsuit.

Request for Production No. 114: Please produce all documents referring or related to any sale, attempted sale, or valuation of Oilpro, including, but not limited to, Jonathan Fairbanks and/or his family trusts acquiring an interest in Oilpro.

Response: Oilpro objects to this request for production because it may include within its scope trial-preparation material (documents that are prepared in anticipation of litigation or for trial) exempted from discovery by Fed. R. Civ. P. 26(b)(3). Oilpro objects to this request for production because it may include within its scope documents and communications that are exempted from discovery by the attorney-client privilege, joint-defense privilege, and/or the attorney work-product doctrine. Oilpro objects to this request for production because it does not seek documents relevant to any claim or defense in this lawsuit.

Subject to the foregoing objections and limitations, Oilpro will produce responsive documents for the date range October 1, 2013 – March 29, 2016. Oilpro is currently reviewing and collecting documents within its possession and control and will supplement this response to advise Plaintiffs if it is knowingly withholding any materials identified in this search on the basis of the objections identified above.

Request for Production No. 115: Please produce all documents referring or related to UK Dedicated Servers Limited.

Response: Oilpro objects to this request for production because it fails to identify the requested materials with reasonable particularity as required by FED. R. CIV. P. 34(b). Oilpro objects to this request for production because it does not seek documents relevant to any claim or defense in this lawsuit; specifically, Oilpro objects because the request for production is not limited to a relevant time period. Oilpro objects to this request for production because it may include within its scope trial-preparation material (documents that are prepared in anticipation of litigation or for trial) exempted from discovery by Fed. R. Civ. P. 26(b)(3). Oilpro objects to this request for production because it may include within its scope documents and communications that are exempted from discovery by the attorney-client privilege, joint-defense privilege, and/or the attorney work-product doctrine. Oilpro objects to this request for production because it seeks to impose an undue burden and expense that outweighs its likely benefit, and is not proportional to the needs of the case pursuant to FED. R. CIV. P. 26(b)(1).

Request for Production No. 116: Please produce documents sufficient to identify any UK Dedicated Servers Limited IP Address(es) accessed or used by you between January 1, 2013 and present.

Response: Oilpro objects to this request for production because it fails to identify the requested materials with reasonable particularity as required by FED. R. CIV. P. 34(b). Oilpro objects to this request for production because it does not seek documents relevant to any claim or defense in this lawsuit; specifically, Oilpro objects because the request for production is not limited to a relevant time period. Oilpro objects to this request for production because it may include within its scope trial-preparation material (documents that are prepared in anticipation of litigation or for trial) exempted from discovery by Fed. R. Civ. P. 26(b)(3). Oilpro objects to this request for production because it may include within its scope documents and communications that are exempted from discovery by the attorney-client privilege, joint-defense privilege, and/or the attorney work-product doctrine. Oilpro objects to this request for production because it seeks to impose an

undue burden and expense that outweighs its likely benefit, and is not proportional to the needs of the case pursuant to FED. R. CIV. P. 26(b)(1).

Request for Production No. 117: Please produce all documents referring or related to HideMyAss.com and/or Hide-My-Ass.com.

Response: Oilpro objects to this request for production because it fails to identify the requested materials with reasonable particularity as required by FED. R. CIV. P. 34(b). Oilpro objects to this request for production because it does not seek documents relevant to any claim or defense in this lawsuit; specifically, Oilpro objects because the request for production is not limited to a relevant time period. Oilpro objects to this request for production because it may include within its scope trial-preparation material (documents that are prepared in anticipation of litigation or for trial) exempted from discovery by Fed. R. Civ. P. 26(b)(3). Oilpro objects to this request for production because it may include within its scope documents and communications that are exempted from discovery by the attorney-client privilege, joint-defense privilege, and/or the attorney work-product doctrine. Oilpro objects to this request for production because it seeks to impose an undue burden and expense that outweighs its likely benefit, and is not proportional to the needs of the case pursuant to FED. R. CIV. P. 26(b)(1).

Request for Production No. 118: Please produce documents sufficient to identify any HideMyAss.com and/or Hide-My-Ass.com IP Address(es) accessed or used by you between January 1, 2013 and present.

Response: Oilpro objects to this request for production because it fails to identify the requested materials with reasonable particularity as required by FED. R. CIV. P. 34(b). Oilpro objects to this request for production because it does not seek documents relevant to any claim or defense in this lawsuit; specifically, Oilpro objects because the request for production is not limited to a relevant time period. Oilpro objects to this request for production because it may include within its scope trial-preparation material (documents that are prepared in anticipation of litigation or for trial) exempted from discovery by Fed. R. Civ. P. 26(b)(3). Oilpro objects to this request for production because it may include within its scope documents and communications that are exempted from discovery by the attorney-client privilege, joint-defense privilege, and/or the attorney work-product doctrine. Oilpro objects to this request for production because it seeks to impose an undue burden and expense that outweighs its likely benefit, and is not proportional to the needs of the case pursuant to FED. R. CIV. P. 26(b)(1).

Request for Production No. 119: Please produce all documents referring or related to Privax Ltd.

Response: Oilpro objects to this request for production because it fails to identify the requested materials with reasonable particularity as required by FED. R. CIV. P. 34(b). Oilpro objects to this request for production because it does not seek documents relevant to any claim or defense in this lawsuit; specifically, Oilpro objects because the request for production is not limited to a relevant time period. Oilpro objects to this request for production because it may include within its scope trial-preparation material (documents that are prepared in anticipation of litigation or for trial) exempted from discovery by Fed. R. Civ. P. 26(b)(3). Oilpro objects to this request for production because it may include within its scope documents and communications that are exempted from discovery by the attorney-client privilege, joint-defense privilege, and/or the attorney work-product doctrine. Oilpro objects to this request for production because it seeks to impose an undue burden and expense that outweighs its likely benefit, and is not proportional to the needs of the case pursuant to FED. R. CIV. P. 26(b)(1).

Request for Production No. 120: Please produce documents sufficient to identify any Privax Ltd. IP Address(es) accessed or used by you between January 1, 2013 and present.

Response: Oilpro objects to this request for production because it fails to identify the requested materials with reasonable particularity as required by FED. R. CIV. P. 34(b). Oilpro objects to this request for production because it does not seek documents relevant to any claim or defense in this lawsuit; specifically, Oilpro objects because the request for production is not limited to a relevant time period. Oilpro objects to this request for production because it may include within its scope trial-preparation material (documents that are prepared in anticipation of litigation or for trial) exempted from discovery by Fed. R. Civ. P. 26(b)(3). Oilpro objects to this request for production because it may include within its scope documents and communications that are exempted from discovery by the attorney-client privilege, joint-defense privilege, and/or the attorney work-product doctrine. Oilpro objects to this request for production because it seeks to impose an undue burden and expense that outweighs its likely benefit, and is not proportional to the needs of the case pursuant to FED. R. CIV. P. 26(b)(1).

Request for Production No. 121: Please produce all documents that refer or relate to Operation Trojan Horse.

Response: Oilpro objects to this request for production because it may include within its scope documents and communications that are exempted from discovery by the attorney-client privilege, joint-defense privilege, and/or the attorney

work-product doctrine. Oilpro objects to this request for production because it may include within its scope trial-preparation material (documents that are prepared in anticipation of litigation or for trial) exempted from discovery by Fed. R. Civ. P. 26(b)(3). Oilpro objects to this request for production because it does not seek documents relevant to any claim or defense in this lawsuit; specifically, Oilpro objects because the request for production is not limited to a relevant time period. Oilpro objects to this request for production because it seeks to impose an undue burden and expense that outweighs its likely benefit, and is not proportional to the needs of the case pursuant to FED. R. CIV. P. 26(b)(1).

Subject to the foregoing objections and limitations, Oilpro will produce responsive documents for the date range October 1, 2013 – March 29, 2016. Oilpro is currently reviewing and collecting documents within its possession and control and will supplement this response to advise Plaintiffs if it is knowingly withholding any materials identified in this search on the basis of the objections identified above.

Request for Production No. 122: Please produce all communications between you and any individual or entity that you had reason to believe was a past, current, and/or prospective member of Rigzone at the time the communication was made, including but not limited to Princepeet Chana, prince@workdigital.co.uk, Kim Phillips, Peter Rae, Michael McGuire, Proverb18@msn.com, michael.mcguire77098@gmail.com, and/or peter.rae.aberdeen@gmail.com.

Response: Oilpro objects to this request for production because it does not seek documents relevant to any claim or defense in this lawsuit; specifically, Oilpro objects because the request for production is not limited to a relevant time period. Oilpro objects to this request for production because it is vague and ambiguous as to whom Oilpro would have a reason to believe was a past, current, and/or prospective member of Rigzone. Oilpro objects to this request for production because it fails to identify the requested materials with reasonable particularity as required by FED. R. CIV. P. 34(b). Oilpro objects to this request for production because it seeks to impose an undue burden and expense that outweighs its likely benefit, and is not proportional to the needs of the case pursuant to FED. R. CIV. P. 26(b)(1).

Subject to the foregoing objections and limitations, Oilpro will produce responsive documents Oilpro will produce communications between Oilpro and the specifically-identified individuals (i.e., Princepeet Chana, prince@workdigital.co.uk, Kim Phillips, Peter Rae, Michael McGuire, Proverb18@msn.com, michael.mcguire77098@gmail.com, and/or peter.rae.aberdeen@gmail.com). Oilpro is currently reviewing and collecting documents within its possession and control

and will supplement this response to advise Plaintiffs if it is knowingly withholding any materials identified in this search on the basis of the objections identified above.

Request for Production No. 123: Please produce all documents concerning any communications between you and any individual or entity that you had reason to believe was a past, current, and/or prospective member of Rigzone at the time the communication was made, including but not limited to Princepeet Chana, prince@workdigital.co.uk, Kim Phillips, Peter Rae, Michael McGuire, Proverb18@msn.com, michael.mcguire77098@gmail.com, and/or peter.rae.aberdeen@gmail.com.

Response: Oilpro objects to this request for production because it does not seek documents relevant to any claim or defense in this lawsuit; specifically, Oilpro objects because the request for production is not limited to a relevant time period. Oilpro objects to this request for production because it is vague and ambiguous as to whom Oilpro would have a reason to believe was a past, current, and/or prospective member of Rigzone. Oilpro objects to this request for production because it fails to identify the requested materials with reasonable particularity as required by FED. R. CIV. P. 34(b). Oilpro objects to this request for production because it seeks to impose an undue burden and expense that outweighs its likely benefit, and is not proportional to the needs of the case pursuant to FED. R. CIV. P. 26(b)(1).

Subject to the foregoing objections and limitations, Oilpro will produce responsive documents Oilpro will produce documents and communications related to specifically-identified individuals (i.e., Princepeet Chana, prince@workdigital.co.uk, Kim Phillips, Peter Rae, Michael McGuire, Proverb18@msn.com, michael.mcguire77098@gmail.com, and/or peter.rae.aberdeen@gmail.com). Oilpro is currently reviewing and collecting documents within its possession and control and will supplement this response to advise Plaintiffs if it is knowingly withholding any materials identified in this search on the basis of the objections identified above.

Request for Production No. 124: Please produce all documents referring or related to any HTTP Request made to the Rigzone website by Oilpro and/or Defendants.

Response: Oilpro objects to this request for production because it may include within its scope documents and communications that are exempted from discovery by the attorney-client privilege, joint-defense privilege, and/or the attorney work-product doctrine. Oilpro objects to this request for production because it may include within its scope trial-preparation material (documents that are pre-

pared in anticipation of litigation or for trial) exempted from discovery by Fed. R. Civ. P. 26(b)(3).

Subject to the foregoing objections and limitations, Oilpro will produce responsive documents for the date range October 1, 2013 – March 29, 2016. Oilpro is currently reviewing and collecting documents within its possession and control and will supplement this response to advise Plaintiffs if it is knowingly withholding any materials identified in this search on the basis of the objections identified above.

Request for Production No. 125: Please produce documents sufficient to identify all HTTP Requests made to the Rigzone website by Oilpro and/or Defendants since January 1, 2013.

Response: Oilpro objects to this request for production because it fails to identify the requested materials with reasonable particularity as required by FED. R. CIV. P. 34(b). Oilpro further objects to this request for production because it is vague and ambiguous as to what documents would be sufficient to identify all HTTP Requests.

Request for Production No. 126: Please produce all documents referring or related to the “123admin” parameter in the Rigzone website.

Response: Oilpro objects to this request for production because it may include within its scope documents and communications that are exempted from discovery by the attorney-client privilege, joint-defense privilege, and/or the attorney work-product doctrine. Oilpro objects to this request for production because it may include within its scope trial-preparation material (documents that are prepared in anticipation of litigation or for trial) exempted from discovery by Fed. R. Civ. P. 26(b)(3).

Subject to the foregoing objections and limitations, Oilpro will produce responsive documents for the date range October 1, 2013 – March 29, 2016. Oilpro is currently reviewing and collecting documents within its possession and control and will supplement this response to advise Plaintiffs if it is knowingly withholding any materials identified in this search on the basis of the objections identified above.

Request for Production No. 127: Please produce all communications that include the term “123admin” sent to, sent from, and/or copying one or more of the Defendants.

Response: Oilpro objects to this request for production because it may include within its scope documents and communications that are exempted from discovery by the attorney-client privilege, joint-defense privilege, and/or the attorney work-product doctrine. Oilpro objects to this request for production because it may include within its scope trial-preparation material (documents that are prepared in anticipation of litigation or for trial) exempted from discovery by Fed. R. Civ. P. 26(b)(3). Oilpro objects to this request for production because it does not seek documents relevant to any claim or defense in this lawsuit.

Subject to the foregoing objections and limitations, Oilpro will produce responsive documents for the date range October 1, 2013 – March 29, 2016, that refer to Rigzone. Oilpro is currently reviewing and collecting documents within its possession and control and will supplement this response to advise Plaintiffs if it is knowingly withholding any materials identified in this search on the basis of the objections identified above.

Request for Production No. 128: Please produce all documents that include the term “123admin”.

Response: Oilpro objects to this request for production because it may include within its scope documents and communications that are exempted from discovery by the attorney-client privilege, joint-defense privilege, and/or the attorney work-product doctrine. Oilpro objects to this request for production because it may include within its scope trial-preparation material (documents that are prepared in anticipation of litigation or for trial) exempted from discovery by Fed. R. Civ. P. 26(b)(3). Oilpro objects to this request for production because it does not seek documents relevant to any claim or defense in this lawsuit.

Subject to the foregoing objections and limitations, Oilpro will produce responsive documents for the date range October 1, 2013 – March 29, 2016, that refer to Rigzone. Oilpro is currently reviewing and collecting documents within its possession and control and will supplement this response to advise Plaintiffs if it is knowingly withholding any materials identified in this search on the basis of the objections identified above.

Request for Production No. 129: Please produce all documents related to the Rigzone website source code file “resume.asp” and/or “resume_writer.asp”.

Response: Oilpro objects to this request for production because it may include within its scope documents and communications that are exempted from discovery by the attorney-client privilege, joint-defense privilege, and/or the attorney work-product doctrine. Oilpro objects to this request for production because it may include within its scope trial-preparation material (documents that are prepared in anticipation of litigation or for trial) exempted from discovery by Fed. R. Civ. P. 26(b)(3). Oilpro objects to this request for production because it does not seek documents relevant to any claim or defense in this lawsuit.

Subject to the foregoing objections and limitations, Oilpro will produce responsive documents for the date range October 1, 2013 – March 29, 2016. Oilpro is currently reviewing and collecting documents within its possession and control and will supplement this response to advise Plaintiffs if it is knowingly withholding any materials identified in this search on the basis of the objections identified above.

Request for Production No. 130: Please produce all communications that include the term “resume.asp” and/or “resume_writer.asp” sent to, sent from, and/or copying one or more of the Defendants.

Response: Oilpro objects to this request for production because it may include within its scope documents and communications that are exempted from discovery by the attorney-client privilege, joint-defense privilege, and/or the attorney work-product doctrine. Oilpro objects to this request for production because it may include within its scope trial-preparation material (documents that are prepared in anticipation of litigation or for trial) exempted from discovery by Fed. R. Civ. P. 26(b)(3). Oilpro objects to this request for production because it does not seek documents relevant to any claim or defense in this lawsuit.

Subject to the foregoing objections and limitations, Oilpro will produce responsive all communications that include the term "resume.asp" and/or "resume_writer.asp" that relate to the Rigzone website and were sent to, sent from, and/or copying one or more of the Defendants from October 1, 2013 through March 29, 2016. Oilpro is currently reviewing and collecting documents within its possession and control and will supplement this response to advise Plaintiffs if it is knowingly withholding any materials identified in this search on the basis of the objections identified above.

Request for Production No. 131: All documents that include the term “resume.asp” and/or “resume_writer.asp”.

Response: Oilpro objects to this request for production because it may include within its scope documents and communications that are exempted from discovery by the attorney-client privilege, joint-defense privilege, and/or the attorney work-product doctrine. Oilpro objects to this request for production because it may include within its scope trial-preparation material (documents that are prepared in anticipation of litigation or for trial) exempted from discovery by Fed. R. Civ. P. 26(b)(3). Oilpro objects to this request for production because it does not seek documents relevant to any claim or defense in this lawsuit.

Subject to the foregoing objections and limitations, Oilpro will produce responsive all documents that include the term "resume.asp" and/or "resume_writer.asp" that relate to the Rigzone website for the date range October 1, 2013 through March 29, 2016. Oilpro is currently reviewing and collecting documents within its possession and control and will supplement this response to advise Plaintiffs if it is knowingly withholding any materials identified in this search on the basis of the objections identified above.

Request for Production No. 132: Please produce all emails and attachments thereto sent to, sent from, and/or copying one or more of the Defendants from October 15, 2013 to October 19, 2013 that relates or refers to Rigzone, Rigzone’s members, Rigzone’s computer systems, Oilpro’s members, Oilpro obtaining additional members or resumes, members lists, Oilpro’s third-party resume database, and/or Oilpro soliciting new members.

Response: Oilpro objects to this request for production because it does not seek documents relevant to any claim or defense in this lawsuit. Relevance. Oilpro objects to this request for production because it seeks to impose an undue burden and expense that outweighs its likely benefit, and is not proportional to the needs of the case pursuant to FED. R. CIV. P. 26(b)(1).

Subject to the foregoing objections and limitations, Oilpro will produce responsive documents. Oilpro is currently reviewing and collecting documents within its possession and control and will supplement this response to advise Plaintiffs if it is knowingly withholding any materials identified in this search on the basis of the objections identified above.

Request for Production No. 133: Please produce all emails and attachments thereto sent to, sent from, and/or copying one or more of the Defendants from February 4, 2014 to February 8, 2014 that relates or refers to Rigzone, Rigzone’s members, Rigzone’s com-

puter systems, Oilpro's members, Oilpro obtaining additional members or resumes, members lists, Oilpro's third-party resume database, and/or Oilpro soliciting new members.

Response: Oilpro objects to this request for production because it does not seek documents relevant to any claim or defense in this lawsuit. Relevance. Oilpro objects to this request for production because it seeks to impose an undue burden and expense that outweighs its likely benefit, and is not proportional to the needs of the case pursuant to FED. R. CIV. P. 26(b)(1).

Subject to the foregoing objections and limitations, Oilpro will produce responsive documents. Oilpro is currently reviewing and collecting documents within its possession and control and will supplement this response to advise Plaintiffs if it is knowingly withholding any materials identified in this search on the basis of the objections identified above.

Request for Production No. 134: Please produce all emails and attachments thereto sent to, sent from, and/or copying one or more of the Defendants from April 1, 2014 to April 24, 2014 that relates or refers to Rigzone, Rigzone's members, Rigzone's computer systems, Oilpro's members, Oilpro obtaining additional members or resumes, members lists, Oilpro's third-party resume database, and/or Oilpro soliciting new members.

Response: Oilpro objects to this request for production because it does not seek documents relevant to any claim or defense in this lawsuit. Relevance. Oilpro objects to this request for production because it seeks to impose an undue burden and expense that outweighs its likely benefit, and is not proportional to the needs of the case pursuant to FED. R. CIV. P. 26(b)(1).

Subject to the foregoing objections and limitations, Oilpro will produce responsive documents. Oilpro is currently reviewing and collecting documents within its possession and control and will supplement this response to advise Plaintiffs if it is knowingly withholding any materials identified in this search on the basis of the objections identified above.

Request for Production No. 135: Please produce all emails and attachments thereto sent to, sent from, and/or copying one or more of the Defendants from June 14, 2015 to June 18, 2015 that relates or refers to Rigzone, Rigzone's members, Rigzone's computer systems, Oilpro's members, Oilpro obtaining additional members or resumes, members lists, Oilpro's third-party resume database, and/or Oilpro soliciting new members.

Response: Oilpro objects to this request for production because it does not seek documents relevant to any claim or defense in this lawsuit. Relevance. Oilpro ob-

jects to this request for production because it seeks to impose an undue burden and expense that outweighs its likely benefit, and is not proportional to the needs of the case pursuant to FED. R. CIV. P. 26(b)(1).

Subject to the foregoing objections and limitations, Oilpro will produce responsive documents. Oilpro is currently reviewing and collecting documents within its possession and control and will supplement this response to advise Plaintiffs if it is knowingly withholding any materials identified in this search on the basis of the objections identified above.

Request for Production No. 136: Please produce all emails and attachments thereto sent to, sent from, and/or copying one or more of the Defendants from July 25, 2015 to July 29, 2015 that relates or refers to Rigzone, Rigzone's members, Rigzone's computer systems, Oilpro's members, Oilpro obtaining additional members or resumes, members lists, Oilpro's third-party resume database, and/or Oilpro soliciting new members.

Response: Oilpro objects to this request for production because it does not seek documents relevant to any claim or defense in this lawsuit. Relevance. Oilpro objects to this request for production because it seeks to impose an undue burden and expense that outweighs its likely benefit, and is not proportional to the needs of the case pursuant to FED. R. CIV. P. 26(b)(1).

Subject to the foregoing objections and limitations, Oilpro will produce responsive documents. Oilpro is currently reviewing and collecting documents within its possession and control and will supplement this response to advise Plaintiffs if it is knowingly withholding any materials identified in this search on the basis of the objections identified above.

Request for Production No. 137: Please produce all documents related to any review, inspection, evaluation, analysis, and/or use of any Rigzone Information.

Response: Oilpro objects to this request for production because it may include within its scope documents and communications that are exempted from discovery by the attorney-client privilege, joint-defense privilege, and/or the attorney work-product doctrine. Oilpro objects to this request for production because it may include within its scope trial-preparation material (documents that are prepared in anticipation of litigation or for trial) exempted from discovery by Fed. R. Civ. P. 26(b)(3). Oilpro objects to this request for production because the definition of the "Rigzone Information" is vague and ambiguous. Oilpro objects to this request for production because it fails to identify the requested materials with reasonable particularity as required by FED. R. CIV. P. 34(b). Oilpro objects to this request for production because it does not seek documents relevant to any claim

or defense in this lawsuit; specifically, Oilpro objects because the request for production is not limited to a relevant time period.

Request for Production No. 138: Oilpro's document retention policy.

Response: Oilpro is currently reviewing and collecting documents within its possession and control and Oilpro will produce any responsive documents it discovers.

Request for Production No. 139: Oilpro's policy concerning member privacy.

Response: Oilpro is currently reviewing and collecting documents within its possession and control and Oilpro will produce any responsive documents it discovers.

Request for Production No. 140: Oilpro's employee manual.

Response: Oilpro is currently reviewing and collecting documents within its possession and control and Oilpro will produce any responsive documents it discovers.

Request for Production No. 141: Please produce all documents, communications, and agreements related to the treatment of confidential information by your employees.

Response: Oilpro objects to this request for production because it may include within its scope documents and communications that are exempted from discovery by the attorney-client privilege, joint-defense privilege, and/or the attorney work-product doctrine. Oilpro objects to this request for production because it may include within its scope trial-preparation material (documents that are prepared in anticipation of litigation or for trial) exempted from discovery by Fed. R. Civ. P. 26(b)(3). Oilpro objects to this request for production because it does not seek documents relevant to any claim or defense in this lawsuit.

Subject to the foregoing objections and limitations, Oilpro all agreements and policies that govern the treatment of confidential information by Oilpro's employees. Oilpro is currently reviewing and collecting documents within its possession and control and will supplement this response to advise Plaintiffs if it is knowingly withholding any materials identified in this search on the basis of the objections identified above.

Request for Production No. 142: Please produce all documents, communications, and agreements related to the treatment of trade secrets by your employees.

Response: Oilpro objects to this request for production because it may include within its scope documents and communications that are exempted from discovery by the attorney-client privilege, joint-defense privilege, and/or the attorney work-product doctrine. Oilpro objects to this request for production because it may include within its scope trial-preparation material (documents that are prepared in anticipation of litigation or for trial) exempted from discovery by Fed. R. Civ. P. 26(b)(3). Oilpro objects to this request for production because it does not seek documents relevant to any claim or defense in this lawsuit.

Subject to the foregoing objections and limitations, Oilpro all agreements and policies that govern the treatment of trade secrets by Oilpro's employees. Oilpro is currently reviewing and collecting documents within its possession and control and will supplement this response to advise Plaintiffs if it is knowingly withholding any materials identified in this search on the basis of the objections identified above.

Request for Production No. 143: Please produce all documents related to and/or including any effort undertaken by one or more of the Defendants to access, download, or obtain all or any part of Rigzone's Member Database.

Response: Oilpro objects to this request for production because it may include within its scope documents and communications that are exempted from discovery by the attorney-client privilege, joint-defense privilege, and/or the attorney work-product doctrine. Oilpro objects to this request for production because it may include within its scope trial-preparation material (documents that are prepared in anticipation of litigation or for trial) exempted from discovery by Fed. R. Civ. P. 26(b)(3). Oilpro objects to this request for production because it does not seek documents relevant to any claim or defense in this lawsuit; specifically, Oilpro objects because the request for production is not limited to a relevant time period.

Subject to the foregoing objections and limitations, Oilpro will produce responsive documents for the date range October 1, 2013 – March 29, 2016. Oilpro is currently reviewing and collecting documents within its possession and control and will supplement this response to advise Plaintiffs if it is knowingly withholding any materials identified in this search on the basis of the objections identified above.

Request for Production No. 144: Please produce all documents related to and/or including any effort undertaken by one or more of the Defendants to access, download, or obtain all or any part of Rigzone's Google Analytics account.

Response: Oilpro objects to this request for production because it may include within its scope documents and communications that are exempted from discovery by the attorney-client privilege, joint-defense privilege, and/or the attorney work-product doctrine. Oilpro objects to this request for production because it may include within its scope trial-preparation material (documents that are prepared in anticipation of litigation or for trial) exempted from discovery by Fed. R. Civ. P. 26(b)(3). Oilpro objects to this request for production because it does not seek documents relevant to any claim or defense in this lawsuit; specifically, Oilpro objects because the request for production is not limited to a relevant time period.

Subject to the foregoing objections and limitations, Oilpro will produce responsive documents for the date range October 1, 2013 – March 29, 2016. Oilpro is currently reviewing and collecting documents within its possession and control and will supplement this response to advise Plaintiffs if it is knowingly withholding any materials identified in this search on the basis of the objections identified above.

Request for Production No. 145: Please produce all documents related to and/or including any effort undertaken by one or more of the Defendants to access, download, or obtain all or any part of DHI Group's Google Analytics account.

Response: Oilpro objects to this request for production because it may include within its scope documents and communications that are exempted from discovery by the attorney-client privilege, joint-defense privilege, and/or the attorney work-product doctrine. Oilpro objects to this request for production because it may include within its scope trial-preparation material (documents that are prepared in anticipation of litigation or for trial) exempted from discovery by Fed. R. Civ. P. 26(b)(3). Oilpro objects to this request for production because it does not seek documents relevant to any claim or defense in this lawsuit; specifically, Oilpro objects because the request for production is not limited to a relevant time period.

Subject to the foregoing objections and limitations, Oilpro will produce responsive documents for the date range October 1, 2013 – March 29, 2016. Oilpro is currently reviewing and collecting documents within its possession and control and will supplement this response to advise Plaintiffs if it is knowingly withhold-

ing any materials identified in this search on the basis of the objections identified above.

Request for Production No. 146: Please produce all documents related to and/or including any of Rigzone's Google Analytics data.

Response: Oilpro objects to this request for production because it may include within its scope documents and communications that are exempted from discovery by the attorney-client privilege, joint-defense privilege, and/or the attorney work-product doctrine. Oilpro objects to this request for production because it may include within its scope trial-preparation material (documents that are prepared in anticipation of litigation or for trial) exempted from discovery by Fed. R. Civ. P. 26(b)(3). Oilpro objects to this request for production because it does not seek documents relevant to any claim or defense in this lawsuit; specifically, Oilpro objects because the request for production is not limited to a relevant time period.

Subject to the foregoing objections and limitations, Oilpro will produce responsive documents for the date range October 1, 2013 – March 29, 2016. Oilpro is currently reviewing and collecting documents within its possession and control and will supplement this response to advise Plaintiffs if it is knowingly withholding any materials identified in this search on the basis of the objections identified above.

Request for Production No. 147: Please produce all documents related to and/or including any of DHI Group's Google Analytics data.

Response: Oilpro objects to this request for production because it may include within its scope documents and communications that are exempted from discovery by the attorney-client privilege, joint-defense privilege, and/or the attorney work-product doctrine. Oilpro objects to this request for production because it may include within its scope trial-preparation material (documents that are prepared in anticipation of litigation or for trial) exempted from discovery by Fed. R. Civ. P. 26(b)(3). Oilpro objects to this request for production because it does not seek documents relevant to any claim or defense in this lawsuit; specifically, Oilpro objects because the request for production is not limited to a relevant time period.

Subject to the foregoing objections and limitations, Oilpro will produce responsive documents for the date range October 1, 2013 – March 29, 2016. Oilpro is currently reviewing and collecting documents within its possession and control and will supplement this response to advise Plaintiffs if it is knowingly withhold-

ing any materials identified in this search on the basis of the objections identified above.

Request for Production No. 148: Please produce all documents related to and/or including any effort undertaken by one or more of the Defendants to access, download, or obtain all or any part of Rigzone's computer network.

Response: Oilpro objects to this request for production because it may include within its scope documents and communications that are exempted from discovery by the attorney-client privilege, joint-defense privilege, and/or the attorney work-product doctrine. Oilpro objects to this request for production because it may include within its scope trial-preparation material (documents that are prepared in anticipation of litigation or for trial) exempted from discovery by Fed. R. Civ. P. 26(b)(3). Oilpro objects to this request for production because it does not seek documents relevant to any claim or defense in this lawsuit; specifically, Oilpro objects because the request for production is not limited to a relevant time period.

Subject to the foregoing objections and limitations, Oilpro will produce responsive documents for the date range October 1, 2013 – March 29, 2016. Oilpro is currently reviewing and collecting documents within its possession and control and will supplement this response to advise Plaintiffs if it is knowingly withholding any materials identified in this search on the basis of the objections identified above.

Request for Production No. 149: Please produce all documents related to and/or including any effort undertaken by one or more of the Defendants to access, download, or obtain all or any part of DHI Group's computer network.

Response: Oilpro objects to this request for production because it may include within its scope documents and communications that are exempted from discovery by the attorney-client privilege, joint-defense privilege, and/or the attorney work-product doctrine. Oilpro objects to this request for production because it may include within its scope trial-preparation material (documents that are prepared in anticipation of litigation or for trial) exempted from discovery by Fed. R. Civ. P. 26(b)(3). Oilpro objects to this request for production because it does not seek documents relevant to any claim or defense in this lawsuit; specifically, Oilpro objects because the request for production is not limited to a relevant time period.

Subject to the foregoing objections and limitations, Oilpro will produce responsive documents for the date range October 1, 2013 – March 29, 2016. Oilpro is

currently reviewing and collecting documents within its possession and control and will supplement this response to advise Plaintiffs if it is knowingly withholding any materials identified in this search on the basis of the objections identified above.

Request for Production No. 150: Please produce all documents related to and/or including any effort undertaken by one or more of the Defendants to access, download, or obtain all or any part of the Rigzone.com website.

Response: Oilpro objects to this request for production because it may include within its scope documents and communications that are exempted from discovery by the attorney-client privilege, joint-defense privilege, and/or the attorney work-product doctrine. Oilpro objects to this request for production because it may include within its scope trial-preparation material (documents that are prepared in anticipation of litigation or for trial) exempted from discovery by Fed. R. Civ. P. 26(b)(3). Oilpro objects to this request for production because it does not seek documents relevant to any claim or defense in this lawsuit; specifically, Oilpro objects because the request for production is not limited to a relevant time period.

Subject to the foregoing objections and limitations, Oilpro will produce responsive documents for the date range October 1, 2013 – March 29, 2016. Oilpro is currently reviewing and collecting documents within its possession and control and will supplement this response to advise Plaintiffs if it is knowingly withholding any materials identified in this search on the basis of the objections identified above.

Request for Production No. 151: Please produce all documents referring or relating to the customer and/or member acquisition costs for Oilpro.

Response: Oilpro objects to this request for production because it may include within its scope documents and communications that are exempted from discovery by the attorney-client privilege, joint-defense privilege, and/or the attorney work-product doctrine. Oilpro objects to this request for production because it may include within its scope trial-preparation material (documents that are prepared in anticipation of litigation or for trial) exempted from discovery by Fed. R. Civ. P. 26(b)(3). Oilpro objects to this request for production because it does not seek documents relevant to any claim or defense in this lawsuit; specifically, Oilpro objects because the request for production is not limited to a relevant time period.

Subject to the foregoing objections and limitations, Oilpro will produce responsive documents for the date range October 1, 2013 – March 29, 2016. Oilpro is currently reviewing and collecting documents within its possession and control and will supplement this response to advise Plaintiffs if it is knowingly withholding any materials identified in this search on the basis of the objections identified above.

Request for Production No. 152: Please produce all documents referring or relating to the customer and/or member acquisition costs for Rigzone.

Response: Oilpro objects to this request for production because it may include within its scope documents and communications that are exempted from discovery by the attorney-client privilege, joint-defense privilege, and/or the attorney work-product doctrine. Oilpro objects to this request for production because it may include within its scope trial-preparation material (documents that are prepared in anticipation of litigation or for trial) exempted from discovery by Fed. R. Civ. P. 26(b)(3). Oilpro objects to this request for production because it does not seek documents relevant to any claim or defense in this lawsuit; specifically, Oilpro objects because the request for production is not limited to a relevant time period.

Subject to the foregoing objections and limitations, Oilpro will produce responsive documents for the date range October 1, 2013 – March 29, 2016. Oilpro is currently reviewing and collecting documents within its possession and control and will supplement this response to advise Plaintiffs if it is knowingly withholding any materials identified in this search on the basis of the objections identified above.

Request for Production No. 153: Please produce all financial statements for Oilpro.

Response: Oilpro is currently reviewing and collecting documents within its possession and control and Oilpro will produce any responsive documents it discovers.

Request for Production No. 154: Please produce all account statements for Oilpro.

Response: Oilpro objects to this request for production because it does not seek documents relevant to any claim or defense in this lawsuit. Oilpro further objects to this request for production because it is vague and ambiguous; specifically, it is unclear what “account statements” it seeks.

Request for Production No. 155: Please produce all tax returns for Oilpro.

Response: Oilpro objects to this request for production because it does not seek documents relevant to any claim or defense in this lawsuit. Oilpro objects to this request for production because it seeks to impose an undue burden and expense that outweighs its likely benefit, and is not proportional to the needs of the case pursuant to FED. R. CIV. P. 26(b)(1). Specifically, because Oilpro has agreed to produce its financial statements (see Request for Production 153), Plaintiffs do not have a need for the tax returns and this request for production places an undue burden on Oilpro.

Request for Production No. 156: Please produce all operating budgets for Oilpro.

Response: Oilpro objects to this request for production because it does not seek documents relevant to any claim or defense in this lawsuit. Oilpro objects to this request for production because it seeks to impose an undue burden and expense that outweighs its likely benefit, and is not proportional to the needs of the case pursuant to FED. R. CIV. P. 26(b)(1). Specifically, because Oilpro has agreed to produce its financial statements (see Request for Production 153), Plaintiffs do not have a need for Oilpro's operating budgets and this request for production places an undue burden on Oilpro.

Request for Production No. 157: Please produce all business models and stated goals for Oilpro.

Response: Oilpro objects to this request for production because it does not seek documents relevant to any claim or defense in this lawsuit; specifically, Oilpro objects because the request for production is not limited to a relevant time period. Oilpro objects to this request for production because it seeks to impose an undue burden and expense that outweighs its likely benefit, and is not proportional to the needs of the case pursuant to FED. R. CIV. P. 26(b)(1).

Subject to the foregoing objections and limitations, Oilpro will produce responsive documents for the date range October 1, 2013 – March 29, 2016. Oilpro is currently reviewing and collecting documents within its possession and control and will supplement this response to advise Plaintiffs if it is knowingly withholding any materials identified in this search on the basis of the objections identified above.

Request for Production No. 158: Please produce all capitalization tables or equity distribution lists for Oilpro.

Response: Oilpro objects to this request for production because it does not seek documents relevant to any claim or defense in this lawsuit.

Request for Production No. 159: Please produce all Trello boards related or referring to growing Oilpro's member database, Oilpro's member acquisition, Oilpro's growth strategy, Oilpro's marketing strategy, Rigzone, DHI Group, and/or Rigzone's past, present, or future members.

Response: Oilpro objects to this request for production because it does not seek documents relevant to any claim or defense in this lawsuit; specifically, Oilpro objects because the request for production is not limited to a relevant time period. Oilpro objects to this request for production because it seeks to impose an undue burden and expense that outweighs its likely benefit, and is not proportional to the needs of the case pursuant to FED. R. CIV. P. 26(b)(1).

Subject to the foregoing objections and limitations, Oilpro will produce responsive documents for the date range October 1, 2013 – March 29, 2016. Oilpro is currently reviewing and collecting documents within its possession and control and will supplement this response to advise Plaintiffs if it is knowingly withholding any materials identified in this search on the basis of the objections identified above.

Request for Production No. 160: Please produce all documents referring or relating to the June 22, 2016 article published on your website that was entitled "Rapid Membership Growth Explained," including all drafts of the article.

Response: Oilpro objects to this request for production because it may include within its scope trial-preparation material (documents that are prepared in anticipation of litigation or for trial) exempted from discovery by Fed. R. Civ. P. 26(b)(3). Oilpro objects to this request for production because it may include within its scope documents and communications that are exempted from discovery by the attorney-client privilege, joint-defense privilege, and/or the attorney work-product doctrine. Oilpro objects to this request for production because it does not seek documents relevant to any claim or defense in this lawsuit.

Request for Production No. 161: Please produce all documents referring or relating to the process of "source[ing] the origin of each and every active member" that is referenced in the June 22, 2016 article published on your website that was entitled "Rapid Member-

ship Growth Explained,” including all documents showing the origins of each Oilpro member.

Response: Oilpro objects to this request for production because it may include within its scope trial-preparation material (documents that are prepared in anticipation of litigation or for trial) exempted from discovery by Fed. R. Civ. P. 26(b)(3). Oilpro objects to this request for production because it may include within its scope documents and communications that are exempted from discovery by the attorney-client privilege, joint-defense privilege, and/or the attorney work-product doctrine. Oilpro objects to this request for production because it does not seek documents relevant to any claim or defense in this lawsuit.

Request for Production No. 162: Please produce all documents referring or relating to the origin of Nancy Kenney, including the date she joined and her source category.

Response: Oilpro objects to this request for production because it may include within its scope trial-preparation material (documents that are prepared in anticipation of litigation or for trial) exempted from discovery by Fed. R. Civ. P. 26(b)(3). Oilpro objects to this request for production because it may include within its scope documents and communications that are exempted from discovery by the attorney-client privilege, joint-defense privilege, and/or the attorney work-product doctrine. Oilpro objects to this request for production because it does not seek documents relevant to any claim or defense in this lawsuit

Subject to the foregoing objections and limitations, Oilpro will produce responsive documents for the date range October 1, 2013 – March 29, 2016. Oilpro is currently reviewing and collecting documents within its possession and control and will supplement this response to advise Plaintiffs if it is knowingly withholding any materials identified in this search on the basis of the objections identified above.

Request for Production No. 163: Please produce all documents referring or relating to the origin of Bryan Robbins, including the date he joined and his source category.

Response: Oilpro objects to this request for production because it may include within its scope trial-preparation material (documents that are prepared in anticipation of litigation or for trial) exempted from discovery by Fed. R. Civ. P. 26(b)(3). Oilpro objects to this request for production because it may include within its scope documents and communications that are exempted from discovery by the attorney-client privilege, joint-defense privilege, and/or the attorney work-product doctrine. Oilpro objects to this request for production because it does not seek documents relevant to any claim or defense in this lawsuit. Oilpro

further objects because this request is ambiguous as to what it means by the “origin of Bryan Robbins” and “his source category.”

Subject to the foregoing objections and limitations, Oilpro will produce responsive documents for the date range October 1, 2013 – March 29, 2016. Oilpro is currently reviewing and collecting documents within its possession and control and will supplement this response to advise Plaintiffs if it is knowingly withholding any materials identified in this search on the basis of the objections identified above.

Request for Production No. 164: Please produce all documents referring or relating to the origins of your members, including the date each member joined and each member’s source category.

Response: Oilpro objects to this request for production because it may include within its scope trial-preparation material (documents that are prepared in anticipation of litigation or for trial) exempted from discovery by Fed. R. Civ. P. 26(b)(3). Oilpro objects to this request for production because it may include within its scope documents and communications that are exempted from discovery by the attorney-client privilege, joint-defense privilege, and/or the attorney work-product doctrine. Oilpro objects to this request for production because it does not seek documents relevant to any claim or defense in this lawsuit. Oilpro further objects because this request is ambiguous as to what it means by the “origin of your members” and “each member’s source category.”

Request for Production No. 165: Please produce all documents concerning Virtual Bench and/or Brad Smith obtaining a membership to Rigzone.

Response: Oilpro objects to this request for production because it may include within its scope trial-preparation material (documents that are prepared in anticipation of litigation or for trial) exempted from discovery by Fed. R. Civ. P. 26(b)(3). Oilpro objects to this request for production because it may include within its scope documents and communications that are exempted from discovery by the attorney-client privilege, joint-defense privilege, and/or the attorney work-product doctrine. Oilpro objects to this request for production because it does not seek documents relevant to any claim or defense in this lawsuit.

Request for Production No. 166: Please produce all documents concerning Virtual Bench and/or Brad Smith obtaining a membership to OGJC.

Response: Oilpro objects to this request for production because it may include within its scope trial-preparation material (documents that are prepared in antici-

pation of litigation or for trial) exempted from discovery by Fed. R. Civ. P. 26(b)(3). Oilpro objects to this request for production because it may include within its scope documents and communications that are exempted from discovery by the attorney-client privilege, joint-defense privilege, and/or the attorney work-product doctrine. Oilpro objects to this request for production because it does not seek documents relevant to any claim or defense in this lawsuit.

Request for Production No. 167: Please produce all documents concerning Virtual Bench and/or Brad Smith obtaining a membership to Oilcareers.com.

Response: Oilpro objects to this request for production because it may include within its scope trial-preparation material (documents that are prepared in anticipation of litigation or for trial) exempted from discovery by Fed. R. Civ. P. 26(b)(3). Oilpro objects to this request for production because it may include within its scope documents and communications that are exempted from discovery by the attorney-client privilege, joint-defense privilege, and/or the attorney work-product doctrine. Oilpro objects to this request for production because it does not seek documents relevant to any claim or defense in this lawsuit.

Request for Production No. 168: Please produce all communications between you and Virtual Bench and/or Brad Smith concerning Rigzone, Oilpro, OGJC, or Oilcareers.com, including without limitation the January 11, 2016 emails between you and Brad Smith with the subject line “Welcome Back to Rigzone.”

Response: Oilpro objects to this request for production because it may include within its scope trial-preparation material (documents that are prepared in anticipation of litigation or for trial) exempted from discovery by Fed. R. Civ. P. 26(b)(3). Oilpro objects to this request for production because it may include within its scope documents and communications that are exempted from discovery by the attorney-client privilege, joint-defense privilege, and/or the attorney work-product doctrine. Oilpro objects to this request for production because it does not seek documents relevant to any claim or defense in this lawsuit.

Request for Production No. 169: Please produce all documents concerning any attempt to access Rigzone’s Members Database in December 2015.

Response: Oilpro objects to this request for production because it may include within its scope trial-preparation material (documents that are prepared in anticipation of litigation or for trial) exempted from discovery by Fed. R. Civ. P. 26(b)(3). Oilpro objects to this request for production because it may include within its scope documents and communications that are exempted from discov-

ery by the attorney-client privilege, joint-defense privilege, and/or the attorney work-product doctrine.

Subject to the foregoing objections and limitations, Oilpro will produce responsive documents for the date range October 1, 2013 – March 29, 2016. Oilpro is currently reviewing and collecting documents within its possession and control and will supplement this response to advise Plaintiffs if it is knowingly withholding any materials identified in this search on the basis of the objections identified above.

Request for Production No. 170: Please produce all documents and communications referring or relating to any purchase, acquisition, merger, and/or proposed purchase, acquisition, and/or merger of OilandGasPeople.com or any entities that own, are owned by, or are affiliated with OilandGasPeople.com.

Response: Oilpro objects to this request for production because it may include within its scope trial-preparation material (documents that are prepared in anticipation of litigation or for trial) exempted from discovery by Fed. R. Civ. P. 26(b)(3). Oilpro objects to this request for production because it may include within its scope documents and communications that are exempted from discovery by the attorney-client privilege, joint-defense privilege, and/or the attorney work-product doctrine. Oilpro objects to this request for production because it does not seek documents relevant to any claim or defense in this lawsuit.

Request for Production No. 171: Please produce all documents and communications referring or relating to any factual allegation included in Plaintiffs' Original Complaint filed in the Lawsuit.

Response: Oilpro objects to this request for production because it may include within its scope trial-preparation material (documents that are prepared in anticipation of litigation or for trial) exempted from discovery by Fed. R. Civ. P. 26(b)(3). Oilpro objects to this request for production because it may include within its scope documents and communications that are exempted from discovery by the attorney-client privilege, joint-defense privilege, and/or the attorney work-product doctrine. Oilpro objects to this request for production because it does not seek documents relevant to any claim or defense in this lawsuit. Oilpro objects to this request for production because it fails to identify the requested materials with reasonable particularity as required by FED. R. CIV. P. 34(b).

Request for Production No. 172: Please produce all documents and communications referring or relating to any cause of action alleged in Plaintiffs' Original Complaint filed in the Lawsuit.

Response: Oilpro objects to this request for production because it may include within its scope trial-preparation material (documents that are prepared in anticipation of litigation or for trial) exempted from discovery by Fed. R. Civ. P. 26(b)(3). Oilpro objects to this request for production because it may include within its scope documents and communications that are exempted from discovery by the attorney-client privilege, joint-defense privilege, and/or the attorney work-product doctrine. Oilpro objects to this request for production because it does not seek documents relevant to any claim or defense in this lawsuit. Oilpro objects to this request for production because it fails to identify the requested materials with reasonable particularity as required by FED. R. CIV. P. 34(b).

Request for Production No. 173: Please produce all documents that refer or relate to your affirmative defense of waiver.

Response: Oilpro objects to this request for production because it may include within its scope trial-preparation material (documents that are prepared in anticipation of litigation or for trial) exempted from discovery by Fed. R. Civ. P. 26(b)(3). Oilpro objects to this request for production because it may include within its scope documents and communications that are exempted from discovery by the attorney-client privilege, joint-defense privilege, and/or the attorney work-product doctrine. Oilpro objects to this request for production because it fails to identify the requested materials with reasonable particularity as required by FED. R. CIV. P. 34(b).

Subject to the foregoing objections and limitations, Oilpro will produce responsive documents for the date range October 1, 2013 – March 29, 2016. Oilpro is currently reviewing and collecting documents within its possession and control and will supplement this response to advise Plaintiffs if it is knowingly withholding any materials identified in this search on the basis of the objections identified above.

Request for Production No. 174: Please produce all documents that refer or relate to your affirmative defense of estoppel.

Response: Oilpro objects to this request for production because it may include within its scope trial-preparation material (documents that are prepared in anticipation of litigation or for trial) exempted from discovery by Fed. R. Civ. P. 26(b)(3). Oilpro objects to this request for production because it may include

within its scope documents and communications that are exempted from discovery by the attorney-client privilege, joint-defense privilege, and/or the attorney work-product doctrine. Oilpro objects to this request for production because it fails to identify the requested materials with reasonable particularity as required by FED. R. CIV. P. 34(b).

Subject to the foregoing objections and limitations, Oilpro will produce responsive documents for the date range October 1, 2013 – March 29, 2016. Oilpro is currently reviewing and collecting documents within its possession and control and will supplement this response to advise Plaintiffs if it is knowingly withholding any materials identified in this search on the basis of the objections identified above.

Request for Production No. 175: Please produce all documents that refer or relate to your affirmative defense of release.

Response: Oilpro objects to this request for production because it may include within its scope trial-preparation material (documents that are prepared in anticipation of litigation or for trial) exempted from discovery by Fed. R. Civ. P. 26(b)(3). Oilpro objects to this request for production because it may include within its scope documents and communications that are exempted from discovery by the attorney-client privilege, joint-defense privilege, and/or the attorney work-product doctrine. Oilpro objects to this request for production because it fails to identify the requested materials with reasonable particularity as required by FED. R. CIV. P. 34(b).

Subject to the foregoing objections and limitations, Oilpro will produce responsive documents for the date range October 1, 2013 – March 29, 2016. Oilpro is currently reviewing and collecting documents within its possession and control and will supplement this response to advise Plaintiffs if it is knowingly withholding any materials identified in this search on the basis of the objections identified above.

Request for Production No. 176: Please produce all documents that refer or relate to your affirmative defense that Plaintiffs' damages are subject to offset for damages caused by Plaintiffs' conduct.

Response: Oilpro objects to this request for production because it may include within its scope trial-preparation material (documents that are prepared in anticipation of litigation or for trial) exempted from discovery by Fed. R. Civ. P. 26(b)(3). Oilpro objects to this request for production because it may include within its scope documents and communications that are exempted from discov-

ery by the attorney-client privilege, joint-defense privilege, and/or the attorney work-product doctrine. Oilpro objects to this request for production because it fails to identify the requested materials with reasonable particularity as required by FED. R. CIV. P. 34(b).

Subject to the foregoing objections and limitations, Oilpro will produce responsive documents for the date range October 1, 2013 – March 29, 2016. Oilpro is currently reviewing and collecting documents within its possession and control and will supplement this response to advise Plaintiffs if it is knowingly withholding any materials identified in this search on the basis of the objections identified above.

Request for Production No. 177: Please produce all documents that refer or relate to your affirmative defense of laches.

Response: Oilpro objects to this request for production because it may include within its scope trial-preparation material (documents that are prepared in anticipation of litigation or for trial) exempted from discovery by Fed. R. Civ. P. 26(b)(3). Oilpro objects to this request for production because it may include within its scope documents and communications that are exempted from discovery by the attorney-client privilege, joint-defense privilege, and/or the attorney work-product doctrine. Oilpro objects to this request for production because it fails to identify the requested materials with reasonable particularity as required by FED. R. CIV. P. 34(b).

Subject to the foregoing objections and limitations, Oilpro will produce responsive documents for the date range October 1, 2013 – March 29, 2016. Oilpro is currently reviewing and collecting documents within its possession and control and will supplement this response to advise Plaintiffs if it is knowingly withholding any materials identified in this search on the basis of the objections identified above.

Request for Production No. 178: Please produce all documents that refer or relate to your affirmative defense of the doctrine of unclean hands.

Response: Oilpro objects to this request for production because it may include within its scope trial-preparation material (documents that are prepared in anticipation of litigation or for trial) exempted from discovery by Fed. R. Civ. P. 26(b)(3). Oilpro objects to this request for production because it may include within its scope documents and communications that are exempted from discovery by the attorney-client privilege, joint-defense privilege, and/or the attorney work-product doctrine. Oilpro objects to this request for production because it

fails to identify the requested materials with reasonable particularity as required by FED. R. CIV. P. 34(b).

Subject to the foregoing objections and limitations, Oilpro will produce responsive documents for the date range October 1, 2013 – March 29, 2016. Oilpro is currently reviewing and collecting documents within its possession and control and will supplement this response to advise Plaintiffs if it is knowingly withholding any materials identified in this search on the basis of the objections identified above.

Request for Production No. 179: Please produce all documents that refer or relate to your affirmative defense of fraud.

Response: Oilpro objects to this request for production because it may include within its scope trial-preparation material (documents that are prepared in anticipation of litigation or for trial) exempted from discovery by Fed. R. Civ. P. 26(b)(3). Oilpro objects to this request for production because it may include within its scope documents and communications that are exempted from discovery by the attorney-client privilege, joint-defense privilege, and/or the attorney work-product doctrine. Oilpro objects to this request for production because it fails to identify the requested materials with reasonable particularity as required by FED. R. CIV. P. 34(b).

Subject to the foregoing objections and limitations, Oilpro will produce responsive documents for the date range October 1, 2013 – March 29, 2016. Oilpro is currently reviewing and collecting documents within its possession and control and will supplement this response to advise Plaintiffs if it is knowingly withholding any materials identified in this search on the basis of the objections identified above.

Request for Production No. 180: Please produce all documents that refer or relate to your affirmative defense that Plaintiffs' own acts and omissions caused or contributed to their injuries.

Response: Oilpro objects to this request for production because it may include within its scope trial-preparation material (documents that are prepared in anticipation of litigation or for trial) exempted from discovery by Fed. R. Civ. P. 26(b)(3). Oilpro objects to this request for production because it may include within its scope documents and communications that are exempted from discovery by the attorney-client privilege, joint-defense privilege, and/or the attorney work-product doctrine. Oilpro objects to this request for production because it

fails to identify the requested materials with reasonable particularity as required by FED. R. CIV. P. 34(b).

Subject to the foregoing objections and limitations, Oilpro will produce responsive documents for the date range October 1, 2013 – March 29, 2016. Oilpro is currently reviewing and collecting documents within its possession and control and will supplement this response to advise Plaintiffs if it is knowingly withholding any materials identified in this search on the basis of the objections identified above.

Request for Production No. 181: Please produce all documents that refer or relate to your affirmative defense of the statute of limitations.

Response: Oilpro objects to this request for production because it may include within its scope trial-preparation material (documents that are prepared in anticipation of litigation or for trial) exempted from discovery by Fed. R. Civ. P. 26(b)(3). Oilpro objects to this request for production because it may include within its scope documents and communications that are exempted from discovery by the attorney-client privilege, joint-defense privilege, and/or the attorney work-product doctrine. Oilpro objects to this request for production because it fails to identify the requested materials with reasonable particularity as required by FED. R. CIV. P. 34(b).

Subject to the foregoing objections and limitations, Oilpro will produce responsive documents for the date range October 1, 2013 – March 29, 2016. Oilpro is currently reviewing and collecting documents within its possession and control and will supplement this response to advise Plaintiffs if it is knowingly withholding any materials identified in this search on the basis of the objections identified above.

Request for Production No. 182: Please produce a copy of your complete audited financial statements for each year from 2012 through the present.

Response: Oilpro is currently reviewing and collecting documents within its possession and control and Oilpro will produce any responsive documents it discovers.

Request for Production No. 183: Please produce a copy of your balance sheet and income statement for each year from 2012 through the present.

Response: Oilpro objects to this request for production because it does not seek documents relevant to any claim or defense in this lawsuit. Oilpro objects to this

request for production because it seeks to impose an undue burden and expense that outweighs its likely benefit, and is not proportional to the needs of the case pursuant to FED. R. CIV. P. 26(b)(1). Specifically, because Oilpro has agreed to produce its financial statements (see Request for Production 153), Plaintiffs do not have a need for the balance sheet and income statement and this request for production places an undue burden on Oilpro.

Request for Production No. 184: Documents sufficient to show the value of all assets held by you since January 1, 2012, including but not limited to, all checking accounts, savings accounts, and appraisals or other documents reflecting the value of real estate, personal property, money, or other property owned in whole or in part by you.

Response: Oilpro objects to this request for production because it does not seek documents relevant to any claim or defense in this lawsuit. Oilpro objects to this request for production because it seeks to impose an undue burden and expense that outweighs its likely benefit, and is not proportional to the needs of the case pursuant to FED. R. CIV. P. 26(b)(1). Specifically, because Oilpro has agreed to produce its financial statements (see Request for Production 153), Plaintiffs do not have a need for the requested documents and this request for production places an undue burden on Oilpro.

Request for Production No. 185: Please produce all of your capitalization tables from January 1, 2012 to present.

Response: Oilpro objects to this request for production because it does not seek documents relevant to any claim or defense in this lawsuit. Oilpro objects to this request for production because it seeks to impose an undue burden and expense that outweighs its likely benefit, and is not proportional to the needs of the case pursuant to FED. R. CIV. P. 26(b)(1). Specifically, because Oilpro has agreed to produce its financial statements (see Request for Production 153), Plaintiffs do not have a need for the requested documents and this request for production places an undue burden on Oilpro.

Request for Production No. 186: Please produce all records relating to checking accounts in which you own or claim, or have owned or claimed, any interest, whether held by Oilpro or an Oilpro employee or agent, or in your name jointly with any other person or entity, or in your name as trustee or for the benefit of any other person, or otherwise, including checkbooks and check registers, deposit slips, monthly statement, and canceled checks within the last four (4) years.

Response: Oilpro objects to this request for production because it does not seek documents relevant to any claim or defense in this lawsuit. Oilpro objects to this

request for production because it seeks to impose an undue burden and expense that outweighs its likely benefit, and is not proportional to the needs of the case pursuant to FED. R. CIV. P. 26(b)(1). Specifically, because Oilpro has agreed to produce its financial statements (see Request for Production 153), Plaintiffs do not have a need for the requested documents and this request for production places an undue burden on Oilpro.

Request for Production No. 187: Please produce all records relating to savings accounts, certificates of deposit, credit union accounts, or other such accounts in which you own or claim, or have owned or claimed, any interest, whether held by Oilpro or an Oilpro employee or agent, or in your name jointly with any other person or entity, or in your name as trustee or for the benefit of any other person, or otherwise, and showing any and all deposits and withdrawals of every kind and nature (regardless of whether or not the account or accounts have been closed) within the last four (4) years.

Response: Oilpro objects to this request for production because it does not seek documents relevant to any claim or defense in this lawsuit. Oilpro objects to this request for production because it seeks to impose an undue burden and expense that outweighs its likely benefit, and is not proportional to the needs of the case pursuant to FED. R. CIV. P. 26(b)(1). Specifically, because Oilpro has agreed to produce its financial statements (see Request for Production 153), Plaintiffs do not have a need for the requested documents and this request for production places an undue burden on Oilpro.

Request for Production No. 188: Please produce all records relating to real estate (including oil, gas and other minerals), in which you own or claim or have owned or claimed, any interest, including but not limited to any and all deeds, mortgages, deeds of trust, liens, leases, promissory notes, surveys, and settlement statements of purchasers or sellers within the last four (4) years, together with any evidence showing monthly payments and present outstanding balance of principal and interest.

Response: Oilpro objects to this request for production because it does not seek documents relevant to any claim or defense in this lawsuit. Oilpro objects to this request for production because it seeks to impose an undue burden and expense that outweighs its likely benefit, and is not proportional to the needs of the case pursuant to FED. R. CIV. P. 26(b)(1). Specifically, because Oilpro has agreed to produce its financial statements (see Request for Production 153), Plaintiffs do not have a need for the requested documents and this request for production places an undue burden on Oilpro.

Request for Production No. 189: Please produce all certificates of title and all other records relating to any motor vehicle in which you own or claim, or have owned or

claimed, any interest, including, but not limited to, automobiles, trucks, vans, boats, trailers, airplanes, or recreational vehicles.

Response: Oilpro objects to this request for production because it does not seek documents relevant to any claim or defense in this lawsuit. Oilpro objects to this request for production because it seeks to impose an undue burden and expense that outweighs its likely benefit, and is not proportional to the needs of the case pursuant to FED. R. CIV. P. 26(b)(1). Specifically, because Oilpro has agreed to produce its financial statements (see Request for Production 153), Plaintiffs do not have a need for the requested documents and this request for production places an undue burden on Oilpro.

Request for Production No. 190: Please produce all records, correspondence, or documents pertaining to any and all securities and investments in which you own or claim, or have owned or claimed, any interest within the last four (4) years, whether held by Oilpro or an Oilpro employee or agent, or in your name jointly with any other person or entity, or in your name as trustee or for the benefit of any other person, or otherwise, including, but not limited to, the brokerage account and trading account records and statements.

Response: Oilpro objects to this request for production because it does not seek documents relevant to any claim or defense in this lawsuit. Oilpro objects to this request for production because it seeks to impose an undue burden and expense that outweighs its likely benefit, and is not proportional to the needs of the case pursuant to FED. R. CIV. P. 26(b)(1). Specifically, because Oilpro has agreed to produce its financial statements (see Request for Production 153), Plaintiffs do not have a need for the requested documents and this request for production places an undue burden on Oilpro.

Request for Production No. 191: Please produce copies of all mortgages, notes receivable, or other evidence or information relating to debts due in which you own or claim, or have owned or claimed, any interest within the last four (4) years.

Response: Oilpro objects to this request for production because it does not seek documents relevant to any claim or defense in this lawsuit. Oilpro objects to this request for production because it seeks to impose an undue burden and expense that outweighs its likely benefit, and is not proportional to the needs of the case pursuant to FED. R. CIV. P. 26(b)(1). Specifically, because Oilpro has agreed to produce its financial statements (see Request for Production 153), Plaintiffs do not have a need for the requested documents and this request for production places an undue burden on Oilpro.

Request for Production No. 192: Please produce all petitions and/or complaints filed in lawsuits that are currently pending on appeal, or in which judgment has not been satisfied, in which you or your spouse is a party, is a subrogee, or has agreed to indemnify a party.

Response: Oilpro objects to this request for production because it does not seek documents relevant to any claim or defense in this lawsuit.

Request for Production No. 193: Please produce all documents evidencing trusts in which you have a direct or indirect interest.

Response: Oilpro objects to this request for production because it does not seek documents relevant to any claim or defense in this lawsuit. Oilpro objects to this request for production because it seeks to impose an undue burden and expense that outweighs its likely benefit, and is not proportional to the needs of the case pursuant to FED. R. CIV. P. 26(b)(1). Specifically, because Oilpro has agreed to produce its financial statements (see Request for Production 153), Plaintiffs do not have a need for the requested documents and this request for production places an undue burden on Oilpro.

Request for Production No. 194: Please produce all documents evidencing any trusts which you have established for the benefit of anyone in the last four (4) years.

Response: Oilpro objects to this request for production because it does not seek documents relevant to any claim or defense in this lawsuit. Oilpro objects to this request for production because it seeks to impose an undue burden and expense that outweighs its likely benefit, and is not proportional to the needs of the case pursuant to FED. R. CIV. P. 26(b)(1). Specifically, because Oilpro has agreed to produce its financial statements (see Request for Production 153), Plaintiffs do not have a need for the requested documents and this request for production places an undue burden on Oilpro.

Request for Production No. 195: Please produce documents sufficient to show the value of all assets held by you during the last four years, including, but not limited to, all checking accounts, savings accounts, brokerage accounts, stocks, bonds, certificates of deposit, and mutual funds, and appraisals or other documents reflecting the value of real estate or other personal property owned in whole or in part by you.

Response: Oilpro objects to this request for production because it does not seek documents relevant to any claim or defense in this lawsuit. Oilpro objects to this request for production because it seeks to impose an undue burden and expense that outweighs its likely benefit, and is not proportional to the needs of the case

pursuant to FED. R. CIV. P. 26(b)(1). Specifically, because Oilpro has agreed to produce its financial statements (see Request for Production 153), Plaintiffs do not have a need for the requested documents and this request for production places an undue burden on Oilpro.

Request for Production No. 196: Please produce all documents relating to any transfer of assets and/or liabilities during the last four years, including any payments, loans, financial transactions, write-offs, or credit arrangements between you and David W. Kent, Jr., Casey Kent, David Kent, Sr., Matthew Kent, Estevan Dufrin, Bryan Robins, and/or Jeremy Antonini.

Response: Oilpro objects to this request for production because it may include within its scope documents and communications that are exempted from discovery by the attorney-client privilege, joint-defense privilege, and/or the attorney work-product doctrine. Oilpro objects to this request for production because it may include within its scope trial-preparation material (documents that are prepared in anticipation of litigation or for trial) exempted from discovery by Fed. R. Civ. P. 26(b)(3). Oilpro objects to this request for production because it does not seek documents relevant to any claim or defense in this lawsuit.

Subject to the foregoing objections and limitations, Oilpro will produce responsive documents for the date range October 1, 2013 – March 29, 2016. Oilpro is currently reviewing and collecting documents within its possession and control and will supplement this response to advise Plaintiffs if it is knowingly withholding any materials identified in this search on the basis of the objections identified above.

Request for Production No. 197: Please produce all documents relating to any transfer(s) of your asset(s) during the last four years to any location outside of the United States of America.

Response: Oilpro objects to this request for production because it does not seek documents relevant to any claim or defense in this lawsuit. Oilpro further objects to this request for production because it may include within its scope trial-preparation material (documents that are prepared in anticipation of litigation or for trial) exempted from discovery by Fed. R. Civ. P. 26(b)(3). Oilpro further objects to this request for production because it may include within its scope documents and communications that are exempted from discovery by the attorney-client privilege, joint-defense privilege, and/or the attorney work-product doctrine.

Dated: October 6, 2016

Respectfully Submitted,

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CERTIFICATE OF SERVICE

I certify that on October 6, 2016, a copy of the forgoing was served by certified mail with an emailed courtesy copy to the following:

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